

**IDENTIFICATION OF LIMITS TO
DEVELOPMENT OF INNOVATIVE
AFFORDABLE HOUSING TYPES IN THE
TUCSON AREA**

A STUDY COMPLETED BY THE DRACHMAN INSTITUTE
COLLEGE OF ARCHITECTURE, PLANNING, AND LANDSCAPE ARCHITECTURE
THE UNIVERSITY OF ARIZONA
FOR AARP

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In 2020, AARP hired the Drachman Institute at the College of Architecture, Planning, and Landscape Architecture (CAPLA) at the University of Arizona to investigate the development regulations, costs, and trends within the metropolitan Tucson region associated with “innovative” housing types on individual lots. The housing types in question are Accessory Dwelling Units (ADU), Missing Middle Housing (duplex/triplex/fourplex), Tiny Homes, and Manufactured Housing. The area of the study included the Pima County, City of Tucson, Town of Oro Valley, and the City of South Tucson.

For each jurisdiction, the team interviewed zoning and planning staff regarding zoning codes and permitting processes, reviewed zoning code for specific regulations, spoke with general contractors and banking professionals regarding costs, and interviewed developers and architects currently involved in current projects applicable to the study.

The team is composed of Bill Mackey and Bryanna Chavez. Bill is an architect and educator with over 25 years of experience in the development of residential and commercial projects in the Tucson region. Bryanna is a 5th year student in the School of Architecture. Below is a list of the people the team discussed the research with:

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The research took place between October 2020 and January 2021.

This report is structured by housing type within each jurisdiction followed by a discussion on recent developments for innovative housing in the region. We have included maps from each jurisdiction depicting the allowable zones for residential development and the parcels available for ADU's, MMH, Tiny Homes, and Manufactured Housing.

Under housing types, we present general findings, an outline of the probable costs for the housing type – design fees, construction costs, permit review fees, permit construction fees, and impact fees, and a summary regarding financing. We discuss each housing type and the development regulations per jurisdiction associated with that type – what zones permit the housing type and building form and land use requirements.

We present examples of recent projects within the region and recent policy developments within the jurisdictions to accommodate the long running trend for infill development.

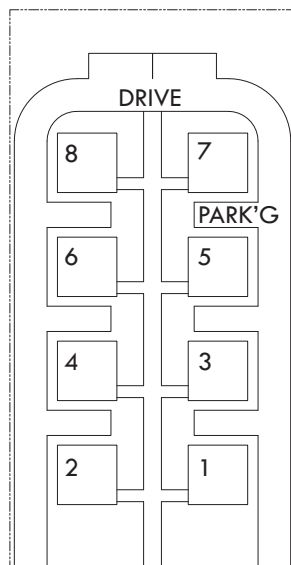
This report is to be used not only as a record of where metropolitan Tucson stands in relation to the development of ADU's, MMH, and manufactured housing, but as a guide for potential developers. Organized by building type, a development team can quickly ascertain the potential regulations and costs associated for their project. But, we use the word “guide” carefully. We cannot stress enough that zoning codes are complicated documents that come with exceptions, overlays, and multiple interpretations. They are also modified and updated frequently. Developers should speak directly with the jurisdiction before embarking on a project. We also cannot stress enough the word “probable” in our cost estimates for each building type. Prices are subject to change and any developer should speak directly with contractors, architects, and city administrators to ascertain the current pricing for construction, professional fees, and permitting fees.

Finally, this report is concerned mostly with the “normal” processes required for the development of land. All of the jurisdictions covered have “special” processes for a variety of developments - Specific Plans, Planned Unit Developments, Planned Area Developments, Flexible Lot Design, Infill Incentive District, Rezoning, Board of Adjustment, Conditional Development Plan. To complicate matters, jurisdictions also have special overlay zones that have their own special requirements that either supersede, replace, or augment standard requirements in the zoning code - Local Historic District, Hillside District, Gateway District, Neighborhood Protection Zone, etc. The nuances for the special processes and the overlay zones are too particular to discuss for this report. It is recommended to discuss the process/zone with staff at the appropriate jurisdiction.

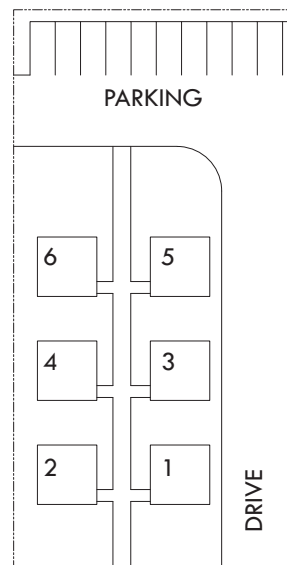
METROPOLITAN TUCSON

Metropolitan Tucson is a desert city that has been settled for a very, very long time, but was primarily developed immediately following World War II. This era is connected to low density, single family housing developments with commercial strip malls lining arterial streets. Tucson has not stopped growing and has had growth spurts throughout every decade since then. During the early growth periods, the single family detached residential home with a garage for one or two automobiles on a single property was the de facto model for development. For the paying consumer, construction costs were low, land prices were low, and infrastructure extensions were relatively lower priced than they are today. Today, though, these costs have risen, and when taken into account with transportation and food costs, ownership of the single family detached house is not an affordable option for many families. Affordability in housing, coupled with an aging population that increases in numbers annually, is pushing development to become more dense.

This is not to say the single family detached residential home was the only thing being built in Tucson between 1920 and now. A variety of multi-family housing has been built throughout the city. I moved here in 1990 and found an affordable 20' x 20' 1-bedroom apartment near the university. It was a cube, and there were 7 other of these on the property. It was a great place to live; we parked our cars between each other's units and all the front doors faced a common walking path, fostering a great camaraderie between all the residents. This development was built in 1939 and could not be built today under the current code. It is excessive of the density requirements and falls short of the parking requirements. Yet, it continues to be inhabited today offering a land owner a steady source of income and residents with an inexpensive housing option in a central location of the city.



1939
8 UNITS
8 PARKING SPACES
8,911 LOT COVERAGE



2021 - IF USING TODAY'S CODE
STANDARDS
6 UNITS
9 PARKING SPACES
9,693 LOT COVERAGE

The consequences of this can be interpreted to be the following: 1. An increase in the heat island effect, 2. reduction in tax base for the city, 3. an increase in rent for the citizens, 4. a decrease in overall income for landowners.

In general, the current codes within the metro Tucson area do not support innovative housing solutions and are a reflection of the automobile centric planning that has occurred since post World War II. Either the code within the core of the city does not facilitate infill development for the average property owner or the codes at the periphery have stringent density calculations or are superseded by restrictions set forth in Homeowner's Association's guidelines. Of course, there are exceptions, which will be covered in this report.

Most jurisdictions define a dwelling or single family residence as a structure that houses a unit of people that are related to each other, don't pay rent to each other, and eat from one kitchen. If you want to develop a property that utilizes multiple kitchens, shared kitchens, shared spaces, you will have zoning staff scratching their head when they try to figure out where it fits in the code. In particular, code language created specifically to reduce "student housing" around the University of Arizona is far from innovative and only perpetuates the status quo of the single family unit dwelling.

ADU's are not recognized by the jurisdictions surrounding metropolitan Tucson. The one exception is the city of South Tucson. The rest of the jurisdictions view ADU's as a second single family dwelling - it is not accessory. Therefore, to build an ADU, all the regulations that apply for a single family house, apply for the ADU. In fact, most of the jurisdictions have precise language stating an accessory unit on a property cannot be used for dwelling. But, in many of the jurisdictions there is a long standing acceptance of existing guest houses. As one planner told us, "in the 25 years I have been in the planning office, I have received zero complaints and served zero zoning violations for anyone using a guest house when they shouldn't be." We all know they exist. We all know someone who has one. Maybe recognizing ADU's officially will finally legitimize something that already exists in the landscape.

MMH - the duplexes, triplexes, and fourplexes of the residential market are all treated as something very distinct from single family housing. They have their own set of rules regarding floor area, height, and building setbacks. They are allowed to exist in zones that comprise a smaller total land area than the dominant single family residential zone (R1). Furthermore, the development of these types of units usually require much more capital invested for development documents for permitting. A recent trend in the MMH category is luxury rental housing for seniors. These developments mostly occur on the periphery of the metro area and they are a much higher density than previous developments focused towards seniors.

Mobile dwelling units are sequestered even further into a tighter area by the jurisdictions, some not even allowing the placement of structures that can be moved again. Tiny Homes are on the radar of zoning staff, but they are not present in the code language. Manufactured housing units are generally allowed by most jurisdictions. Special permitting processes are required for manufactured housing. In most jurisdictions, manufactured housing is not allowed in the dominant, lower density single family house zone.

Some notes should be stated about the process required for the development of these various structures on the various properties.

- Homeowners and developers will probably need to hire an architect and an engineer. Anything beyond 2 or 3 units, depending on the jurisdiction, requires the employment of engineers for the creation of a commercial site plan. An average homeowner cannot produce these documents. Furthermore, any owner developing a property with rentable residential units is required to have an architect produce and seal the documents for permitting and construction. Whereas a homeowner can act as the designer and General Contractor for the construction of a single family home, they must hire a licensed contractor for any structure that will be used as a rental property.
- No infill process seems to be simple anymore; there just aren't that many developable pieces of land that have an easy, by-the-book process with the jurisdiction. Many of the properties near the city core are laden with overlays that come with a complicated set of guidelines and processes. The easy plots are usually out in the desert, but they come with lower density requirements that do not satisfy the innovative developer.
- The interaction between the price of land, the price per square foot to build, and the price per square foot to rent leads to an ever increasing density. Most projects requiring more density, require more complicated processes of neighborhood meetings, specialized reports and documents, and specialized review procedures.

This report does not include Homeowner's Associations and their potential limit on innovative housing developments. It is assumed most HOA's do not allow for ADU's, MMH, Tiny Homes, Mobile Homes, or Manufactured/Factory built housing - unless the HOA is specifically for those types of developments. In general, HOA's exist along the periphery and within the newer developments in the metro area - Sahaurita, Oro Valley, and Marana.

In general, there are not specific design standards or development regulations for ADU's, MMH, or Mobile Dwellings beyond the typical design standards found in the jurisdictions codes.

Some good news, though. The city of Tucson is actively pursuing the allowance of ADU's within particular zones of the city. The last portion of this report gives a little more detail about this happening.

There seems to be movement at a variety of scales producing innovative (or at least different) housing developments. There are grassroots organizations meeting and supporting individuals, locally based developers engaged in small and large scale projects, and local and national companies engaged in the development of high density housing projects.

In conclusion, providing dwelling units at a higher density is a complicated process. While code officials have been making overlay districts and special additional language to the land use codes, there are still many zoning (and HOA) regulations stacked against the metro wide development of ADU's, MMH, and Mobile Dwellings for your average land owner. Many of the planning staff indicated the major hurdles for residential development such as ADU's, MMH, and Mobile Dwellings are code requirements, impact fees, and parking.

We also recommend the following:

1. Jurisdictions should recognize Accessory Dwelling Units as a viable housing option for the citizens of metropolitan Tucson. ADU's should be defined in the various land use codes and development regulations should be assigned to ADU's.
2. Increase the percentage of land area in the metropolitan Tucson region for the development of ADU's and MMH. As it currently stands, ADU's can only be built on a fraction of the properties in the metro area. Yet, we are aware that many, many properties currently have fully functioning ADU's.
3. Create updated standards for parking and vehicle access for residential properties. Special processes exist for the reduction of parking requirements within many of the codes, but we suggest you make the reductions part of the standard code language or at least provide specific standards for ADU's. Also consider revising the Residential Parking Permit program as the city population and density increases.
4. Create updated standards for building setbacks, building height, and lot coverage that balance current standards and existing context/fabric. Many building setback requirements indicated in the existing codes could not be met by the existing fabric of Tucson.
5. Reconsider the current code definitions of family, dwelling unit, kitchen, and group dwelling. Redefining these terms may allow an increase in innovative housing types.
6. Reconsider the process required for the permitting of residential rental properties. Is a professional sealant required for the construction documents? Is a general contractor required for the construction? Can the code and process be made simple enough for an average citizen to develop their property? Can planning staff offer more guidance for the development of properties?

CITY COMPARISON

To provide a little context, we looked at the zoning codes from a few cities in the western United States - Albuquerque, Portland, Seattle, and Phoenix. We determined the dominant residential zone for the city, reviewed the land use code and determined the minimum lot area required for 2 residential units, the maximum lot coverage, the parking requirements, and the setbacks required. This exercise was beneficial in a few ways:

These drawings visually display the differences in the size of lots required for the development of 2 residential units.

We discovered some cities actually allow ADU's and provide language and development standards for their design and construction.

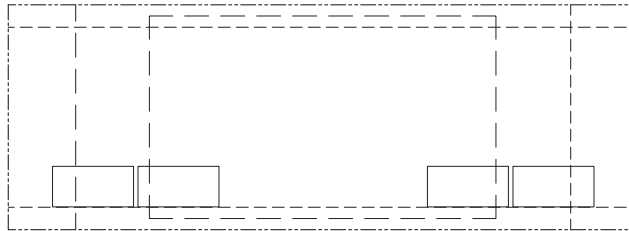
We discovered some land use codes are easier to use than other land use codes. This is important for small scale development. How accessible is the process?

Below we offer the drawings of the idealized dominant parcel for each city and a short synopsis on their land use code.



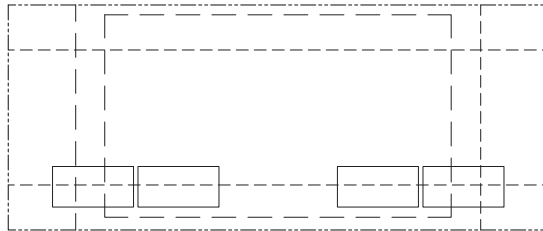
TUCSON

10,000 *sf* MINIMUM LOT SIZE FOR 2 UNITS
4 PARKING SPACES



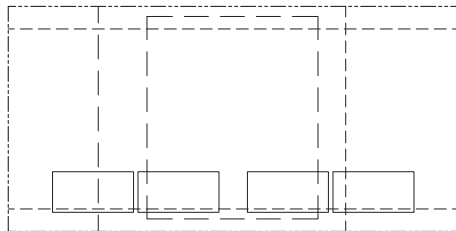
ALBUQUERQUE

7,000 *sf* MINIMUM LOT SIZE FOR 2 UNITS
4 PARKING SPACES



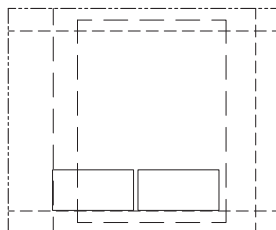
PHOENIX

6,000 *sf* MINIMUM LOT SIZE FOR 2 UNITS
4 PARKING SPACES



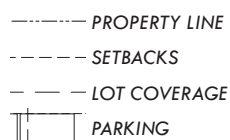
SEATTLE

5,000 *sf* MINIMUM LOT SIZE FOR 2 UNITS
4 PARKING SPACES



PORTLAND

3,000 *sf* MINIMUM LOT SIZE FOR 2 UNITS
2 PARKING SPACES



GENERALIZED RESIDENTIAL LOTS FOR 2 DWELLING UNITS

TUCSON

The land use code document for the City of Tucson is found on their website under planning and developmental services. The unified development code contains a page that defines all terms used in the document. The document is organized into articles and sections, which makes it more navigable. The articles include information about procedures, zones, overlay zones, and dimensional standards for each zone.

ALBUQUERQUE

The integrated development ordinance for the City of Albuquerque is found on their website under the department of planning. The document is similar to the land use document for the city of Tucson. Similar to Tucson, the integrated development ordinance contains a page that defines all terms used in the document. The document is organized into articles and sections, which makes it more navigable. The articles include information about procedures, zones, overlay zones, and dimensional standards for each zone.

PHOENIX

The land use code document for the City of Phoenix is found on their website under planning codes and ordinances. The land use code for the city of Phoenix is a little harder to navigate based on how it is organized on the city website. The website has split its land use code document into multiple documents, unlike other cities who have their land use code as one document. These separate ordinances are then split up into chapters, making the individual ordinances a little easier to navigate. A tool that is helpful when navigating these documents is a search bar on the document's online page which helped narrow down the search for specific zones or dimensional standards.

SEATTLE

The land use code document for the City of Seattle is found on their website under the department of construction and inspections. The zoning code for Seattle is the easiest to navigate of the cities investigated for this report. The zoning code is provided by the city as a brochure rather than a document. The brochure contains a summary of the zoning code as well as supplementary images that help make the code easy to understand. It includes all regulations for that zone such as parking regulations and dimensional standards.

PORTLAND

The land use code document for the city of Portland is found under the city's website. The document's organization is similar to the organization of the Phoenix land use code; the website has split its land use code document into multiple documents. These separate ordinances are then split up into chapters which makes the individual ordinances a little easier to navigate.

Like the city of Seattle, a portion of the zoning code is provided by the city as a brochure rather than a document. The brochure contains a summary of the zoning code as well as supplementary images that help make the code easy to understand. The brochure portion does not contain as much information as the brochure provided by the city of Seattle about different regulations, but the images are helpful for visualizing the dimensional standards. The Portland land use code can also be accessed through the city's zoning code app.

ACCESSORY DWELLING UNIT OVERVIEW

Aside from the City of South Tucson and a current effort by the City of Tucson Planning and Development Services office to include ADUs in the code, Accessory Dwelling Units (ADU's) are not recognized in the metropolitan Tucson region. In most cases, they are considered a second dwelling on a site.

The city of Tucson's dominant residential zone, R-1 allows a second unit when the land area of the parcel exceeds 10,000 square feet. Only 20% of the zone has parcels that meet this requirement. In the other dominant residential zones, 60% of parcels in R-2 and 37% of parcels in R-3 can have 2 units.

In Pima County's dominant single family residential zones, there is a majority of parcels that would allow a second unit.

South Tucson has language permitting accessory dwelling units in its dominant single family residence zone with some restrictions.

In Oro Valley's dominant single family residential zones, a property owner must be able to split the properties and still retain the minimum lot acreage in order to put a second dwelling unit on the property.

All jurisdictions do not reduce any parking requirements for a second dwelling on a site. Typically, a site with 2 dwelling units on it would be required to park 4 vehicles.

On the whole, the typical standards (setbacks and heights) for the construction of a residential structure apply for a second dwelling unit. South Tucson has specific standards for the construction of the ADU and this is noted in that section.

If a property owner were to construct more than 2 dwelling units on a site in the city of Tucson or more than 3 dwelling units on a site in Pima County, the owner would be required to submit a development plan and treat the property as a commercial property - kicking in several other regulations to be met for permitting and construction. Most significantly, the parking would need to meet the much more restrictive commercial parking regulations and would not be allowed to be accessed from an unnamed street (an alley).

If a property owner is to rent the second dwelling unit, they are required to have a licensed architect prepare and submit the construction plans and have a licensed general contractor build the project in the city of Tucson. Pima County, Oro Valley, and South Tucson do not have this requirement. Pima County requires a licensed architect if the structure is greater than 3,000 square feet or if more than 20 people will occupy the building.

ACCESSORY DWELLING UNIT PROBABLE PROJECT COSTS

Project costs are difficult to forecast. Therefore, the associated costs for developing a project are presented with conservative numbers. The project costs below assume a 400 square foot ADU built on a single lot. Costs for professional engineering (architect, mechanical engineer, structural engineer) are included. They are not always required by the jurisdictions for permitting construction documents.

400 SQUARE FOOT ADU

Architecture and Engineering	5,000
Plan Review	88 (PC) 517 (CT) incl below (CST) 555 (OV)
Permit	1,048 (PC) 1,034 (CT) 1,400 (CST) 853 (OV)
Impact Fee	6,577 (PC) 2,748 (CT) 0 (CST) 3,156 (OV)
Construction Cost	80,000

Other costs that may be associated with the project:

SURVEY

GEOTECHNICAL ENGINEERING (GROUND MATERIAL)

UTILITY CONNECTIONS

SEWER CONNECTION FEE

WATER METER UPSIZE

SITE IMPROVEMENTS

LANDSCAPING

DRIVEWAYS AND OTHER HARDSCAPING

FINANCING

Financing for the construction of one ADU would more than likely be available through a variety of financial institutions and mortgage lenders as home equity loans or spot construction financing.

CITY OF TUCSON

The Uniform Development Code (UDC) of the city of Tucson does not have language supporting ADU's. The number of units a property owner can place on a particular property is based purely on the zone and the density calculation allowed for that use within the zone. There are exceptions and overlay zones that are more flexible, but these are not typical and require special knowledge of a professional. Therefore, an accessory dwelling unit is thought of as a second dwelling unit by the City of Tucson.

The city does have regulations for accessory structures within residential zones. Specifically, accessory structures cannot be used for dwelling.

ZONE, NUMBER OF UNITS, LOT AREA

The following table provides the requirements for an ADU within zones that allow residential use within the city of Tucson.

Zone	Required Lot Area		
	2 units	3 units	4 units
R1	10,000	na	na
18.4% Land Area	20.4%		
R2	5,808	8,712	11,616
9.4 % Land Area	41.1%	12%	6.8%
R3	5,000	5,000	5,000
2.6% Land Area	37.2%		
MH-1	14,000	21,000	28,000
3.8% Land Area	2.5%	1.7%	16.5%
MH-2	10,000	na	na
0.2% Land Area	7.5%		
O1	10,890	16,335	21,780
0.04% Land Area	8.3%	5.4%	11.9%
O2	10,890	16,335	21,780
0.04% Land Area	8.3%	5.4%	11.9%
O3	5,000	5,940	7,920
1.8% Land Area	7.8%	15%	22.9
C1	2,420	3,630	4,840
2.4% Land Area	6%	5.7%	65.5%
C2	1,980	2,970	3,960
3.1% Land Area	5.3%	2.2%	85.6%

C3	1,000	1,500	2,000
0.8% Land Area	1.8%	1%	82%
OCR1 and 2	0	0	0
% Land Area	100%		
NC	5,445	na	na
0.0001% Land Area	100%		
MU	7,000	14,000	21,000
0.2% Land Area	10.2%	1.8%	21.6%

PARKING

Parking for all ADU's shall be on-site and follow the standard city of Tucson zoning code parking requirements for residential use:

1 single family unit	2 spaces
2 single family unit	4 spaces
3 or 4 units	Studio less than 400sf: 1 space
	Studio more than 400sf: 1.5 spaces
	2 bedroom: 2 spaces
	3 bedroom: 2.25 spaces
	4 or more bedroom: 2.5 spaces

In R1 zones, for lots containing 2 or more single family dwellings, with the second dwelling having more than one bedroom, all parking must be located on site, either in a side or rear perimeter yard.

HEIGHT AND SETBACKS

Zone	Street Yard	Side Yard	Height	Bldg Cvge
R1	20'	6' or 2/3H	25'	70%
R2	20'	6' or 2/3H	25'	70/75%
R3	20'	6' or 2/3H	40'	70%
MH1	20'	6' or 2/3H	25'	70%
MH2	20'	6' or 2/3H	25'	75%
O1	20'	10' or 3/4H	16'	70%
O2	20'	10' or 3/4H	26'	70%
O3	20'	10' or 3/4H	25'	75%
C1	20'	10' or 3/4H	25'	75%

C2	20'	10' or 3/4H	40'	70%
C3	20'	1.5H or 0	75'	80%
OCR1	20'	1.5H or 0	140'	80%
OCR2	20'	1.5H or 0	300'	80%
NC	20'	10' or 3/4H	16'	70%
MU	20'	10' or 3/4H	25'	70/75%

UTILITIES

Separate utilities are not required for separate dwellings on a site. As long as the two buildings meet the capacity requirements for power and water, extending utilities to a new ADU is standard procedure. If the owner wishes to make separate services for the ADU, it is allowed and significant costs should be expected for the new services from the utility companies.

PROCESS

The process to obtain a building permit for a second home on a site, regardless of zone, is a standard procedure with the City of Tucson. Most homeowners, with guidance from either a professional or staff at the city, will be able to locate a structure on their site meeting the regulations in the UDC and produce the appropriate documents for review. However, if a property owner is going to have 3 or more units on a property, then the property is treated as a “commercial” project, requiring an engineer to produce development plan documents for the property. This also kicks in commercial parking lot requirements and solid waste and recycling standards.

Also, if the homeowner is going to rent the second unit, then a licensed architect is required for the preparation of the construction documents and a licensed contractor is required to build the structure.

PIMA COUNTY

Similar to the city of Tucson, the zoning code of Pima County does not have language supporting ADU's. The number of units a property owner can place on a particular property is based purely on the zone and the density calculation allowed for that use within the zone. There are exceptions through special processes that are more flexible, but these are not typical and require special knowledge of a professional. Therefore, an accessory dwelling unit is thought of as a second dwelling unit by Pima County.

The county does have regulations for accessory structures within residential zones. Specifically, accessory structures cannot be used for dwelling.

The county does have specific language for guest houses, though. A guest house can be built on a property that is 16,000 square feet or more in any zone permitting for general residential regulations, but the guest house must be used by either a member of the main dwelling or their nonpaying guests. The guest house cannot be more than 45% of the main dwelling and have the same access and utilities as the main house.

Finally, the county has language allowing for a secondary dwelling in 2 particular zones (RH and GR-1). The use is restricted to the care of ill, elderly, or disabled persons. Only 1 per lot is allowed. An application process is required and the building must be torn down when it is no longer used for the original purpose of taking care of someone.

ZONE, NUMBER OF UNITS, LOT AREA

The following table provides the requirements for an ADU within zones that allow residential use within Pima County.

Zone	Required Lot Area		
	2 units	3 units	4 units
SH	36,000	na	na
0.24% Land Area	98%		
CR3	8,000	16,000	24,000
0.17% Land Area	31%	2%	55%
CR4	14,000	21,000	28,000
0.09% Land Area	3%	2%	52%
CR5	12,000	18,000	24,000
0.09% Land Area	2%	1%	66%
TR	9,000	13,500	18,000
0.06% Land Area	6%	2%	66%
MU	7,000	10,500	14,000
0.03% Land Area	12%	3%	68%

CB1 and 2	9,000	13,500	18,000
0.05% Land Area	3%	2%	88%

PARKING

Parking for all ADU's shall be on-site and follow the standard Pima County zoning code parking requirements for residential use:

1 bedroom	1 space
2 bedroom	1.5 spaces
3 bedroom	2 spaces
4 bedroom	2.5 spaces

HEIGHT AND SETBACKS

Zone	Front Yard	Side Yard	Rear Yard	Height	Stories	Bldg Cvge
SH						
CR3	20'	8'	25'	34'	2	40%
CR4	20'	10'	10'	34'	-	50%
CR5	20'	10'	10'	34'	-	50%
TR	20'	0'	10'	34'	-	na
MU	20'	7'	25'	34'	2	na
CB1	20'	0'	10'	34'	-	na
CB2	20'	0'	10'	39'	-	na

UTILITIES

Separate utilities are not required for separate dwellings on a site. As long as the two buildings meet the capacity requirements for power and water, extending utilities to a new ADU is standard procedure. If the owner wishes to make separate services for the ADU, it is allowed and significant costs should be expected for the new services from the utility companies.

PROCESS

The process to obtain a building permit for a second home on a site, regardless of zone, is a standard procedure with Pima County. Most homeowners, with guidance from either a professional or staff at the city, will be able to locate a structure on their site meeting the regulations stated in the code and produce the appropriate documents for review. However, if a property owner is going to have more than 3 units on a property, then the property is treated as a "commercial" project, requiring an engineer to produce development plan documents for the property.

SOUTH TUCSON

The city of South Tucson actually recognizes ADUs in its code. For the primary residential-specific zone (SR1), there is language supporting a secondary dwelling structure. The structure cannot be no more than 50% in area of the primary dwelling unit area, the ownership shall be the same as the primary dwelling unit, and the unit can be rented to non-family members. Furthermore, the zoning code for South Tucson allows for residents to have roomers or boarders within their primary dwelling unit. It should be noted if additional accessory structures are built on these properties, they cannot be used for dwelling without going through a special process.

ZONE, NUMBER OF UNITS, LOT AREA

The following table provides the requirements for an ADU within zones that allow residential use within the city of South Tucson.

Zone	Required Lot Area		
	2 units	3 units	4 units
SR1	6,500	na	na
39% Land Area	78%		
SR2	6,000	9,000	12,000
11% Land Area	70%	41%	21%
SR3	6,000	9,000	12,000
0.01% Land Area	90%	0%	0%
SB1/SB2	0	0	0
11% Land Area	100%	100%	100%
SB2A	6,500	6,500	6,500
	500 SF MINIMUM BUILDING AREA FOR RESIDENTIAL USE		
12% Land Area	94%	94%	94%

PARKING

Parking for all ADU's shall be on-site and follow the standard city of South Tucson zoning code parking requirements for residential use:

1 unit	2 spaces
2 unit	4 spaces
3 unit	6 spaces
4 unit	8 spaces
etc	

HEIGHT AND SETBACKS

Zone	Front Yard	Side Yard	Rear Yard	Height	Stories	Bldg Cvrge
SR1	15'	5'-7'	15'	26'	2.5	30% / 25% + 25%
SR2	15'	6'	15'	25'	2	?
SR3	15'	6'-8'	20'	40'	-	?
SB1	15'	?	20'	30'	2	na
SB2A	15'	7'	20'	35'	-	na
SB2	0'	0'	25'	75'		

UTILITIES

Separate utilities are not required for separate dwellings on a site. As long as the two buildings meet the capacity requirements for power and water, extending utilities to a new ADU is standard procedure. If the owner wishes to make separate services for the ADU, it is allowed and significant costs should be expected for the new services from the utility companies.

PROCESS

The process to obtain a building permit for a second home on a site, regardless of zone, is a standard procedure with the city of South Tucson. Most homeowners, with guidance from either a professional or staff at the city, will be able to locate a structure on their site meeting the regulations stated in the code and produce the appropriate documents for review.

TOWN OF ORO VALLEY

Similar to the city of Tucson, the town of Oro Valley does not have language recognizing ADUs unless the ADU is specifically used by a guest of the principal land use occupant and the ADU does not have a kitchen. Once the ADU has a kitchen, it is considered a dwelling unit.

ZONE, NUMBER OF UNITS, LOT AREA

The following table provides the requirements for an ADU within zones that allow residential use within the town of Oro Valley.

Zone	Required Lot Area		
	2 units	3 units	4 units
R1-144	288,000	na	na
15% Land Area	49.6%		
R1-72	144,000	na	na
4% Land Area	53.8%		
R1-43	87,120	na	na
3% Land Area	26.3%		
R1-36	72,000	na	na
11% Land Area	25.7%		

NOTE: IF TWO UNITS ARE PLACED ON R1-144 THRU R1-36, THE LOTS MUST BE ABLE TO BE SPLIT WITH MEETING ZONING CODE REGULATIONS

R-4	1 ACRE	1 ACRE	1 ACRE
	1 DWELLING PER 5,450 SF OF LAND		
3% Land Area	24.9%	24.9%	24.9%
R-6	5 ACRE	5 ACRE	5 ACRE
	1 DWELLING PER 3,500 SF OF LAND		
0.7% Land Area	64%	64%	64%
R-S	10,900	16,350	21,800
0.4% Land Area	0.4%	4.9%	65.1%

PARKING

Parking for all ADU's shall be on-site and follow the standard Oro Valley zoning code parking requirements for residential use:

1 dwelling	2 spaces
	2 guest spaces

HEIGHT AND SETBACKS

Zone	Front Yard	Side Yard	Rear Yard	Height Stories	Bldg Cvrage
R1-144	50'	20'	50'	18'	20%
R1-72	50'	35'	50'	22'	10%
R1-43	40'	20'	40'	18'	10%
R1-36	40'	15'	40'	18'	10%
R-4				25'	
R-6				25'	
R-S				25'	

UTILITIES

Separate utilities are not required for separate dwellings on a site. As long as the two buildings meet the capacity requirements for power and water, extending utilities to a new ADU is standard procedure. If the owner wishes to make separate services for the ADU, it is allowed and significant costs should be expected for the new services from the utility companies.

PROCESS

The process to obtain a building permit for a second home on a site, regardless of zone, is a standard procedure with the town of Oro Valley. Most homeowners, with guidance from either a professional or staff at the city, will be able to locate a structure on their site meeting the regulations stated in the code and produce the appropriate documents for review.

MISSING MIDDLE HOUSING OVERVIEW

Missing Middle Housing (MMH) is multi-family housing according to most of the zoning codes within the metropolitan region of Tucson. Duplexes and beyond exist in special zones allocated for the development of higher density housing beyond the single family residential house.

In general, the land area allocated for the design and construction of MMH is limited. The city of Tucson has 12% of its land zoned specifically for MMH, Pima County at less than 0.2%, South Tucson at 11%, and Oro Valley under 5%. While the MMH zones are dispersed somewhat evenly throughout the city of Tucson, the MMH zones in Pima County and Oro Valley are in concentrated, specific areas.

Parking for MMH becomes more complicated for the simple reason that more housing equals more parking. Per previous statements, the city of Tucson and Pima County kick in extra parking requirements when a project exceeds 2 units and 3 units respectively.

Building form as determined by height and setbacks is standard within all the jurisdictions and supports mild density.

MMH projects will more than likely require the services of architects and engineers. They are not required in Oro Valley or South Tucson, but if the units are to be rented out by the property owner, the city of Tucson will require an architect to produce the permit and construction documents. Pima County will require a licensed architect if the structure is greater than 3,000 square feet or has more than 20 people occupying at one time.

MISSING MIDDLE HOUSING PROBABLE PROJECT COSTS

Project costs are difficult to forecast. Therefore, the associated costs for developing a project are presented with conservative numbers. The project costs below assume a 2,000 square foot duplex built on a single lot. Costs for professional engineering (architect, mechanical engineer, structural engineer) are included. They are not always required by the jurisdictions for permitting construction documents.

The costs for a triplex in the city of Tucson and a fourplex in Pima County are significantly more. Engineers, landscape architects, and architects will be required to produce a development plan for the jurisdiction to review. This work adds additional costs for professional fees and jurisdiction review fees. If you are prepared to take these on, your project will most likely not pencil as affordable housing.

2000 SQUARE FOOT DUPLEX

Architecture and Engineering	10,000
Plan Review	88 (PC)
	1,397 (CT)
	incl below (CST)
	1,519 (OV)
Permit	3,972 (PC)
	2,794 (CT)
	1,400 (CST)
	2,338 (OV)
Impact Fee	6,577 (PC)
	8,100 (CT)
	0 (CST)
	3,156 (OV)
Construction Cost	340,000 (\$170/sf)

Other costs that may be associated with the project:

SURVEY

GEOTECHNICAL ENGINEERING (GROUND MATERIAL)

UTILITY CONNECTIONS

SEWER CONNECTION FEE

WATER METER UPSIZE

SITE IMPROVEMENTS

LANDSCAPING

DRIVEWAYS AND OTHER HARDSCAPING

FINANCING

Financing for the construction of a duplex, triplex, or fourplex would more than likely be available through local community banks and private lenders. The developer will need to make sure all land entitlements are in place (proper zoning, floodplain, etc.) and it is important the developer has a performance record of bringing housing to market with a debt payment history. It is also imperative the lender can work with an appraiser to properly value the project.

CITY OF TUCSON

The Uniform Development Code (UDC) of the city of Tucson supports the construction of MMH within all of the zones allowing residential construction except for R1. Of significant note, though, the development of any parcel with 3 or more housing units is required to be reviewed as a “commercial” project requiring civil engineers and architects to produce documents for review.

ZONE, NUMBER OF UNITS, LOT AREA

The following table provides the requirements for MMH within zones that allow residential use within the city of Tucson.

Zone	Required Lot Area		
	Duplex	Triplex	fourplex
R2	5,808	8,712	11,616
9.4% Land Area	41.1%	12%	6.8%
R3	5,000	5,000	5,000
2.6% Land Area	37.2%		
MH-1	14,000	21,000	28,000
3.8% Land Area	2.5%	1.7%	16.5%
O1 and O2	10,890	16,335	21,780
0.04% Land Area	8.3%	5.4%	11.9%
O3	5,000	5,940	7,920
1.8% Land Area	7.8%	15%	22.9%
C1	2,420	3,630	4,840
2.4% Land Area	6%	5.7%	65.5%
C2	1,980	2,970	3,960
3.1% Land Area	5.3%	2.2%	85.6%
C3	1,000	1,500	2,000
0.8% Land Area	1.8%	1%	82%
OCR1 and 2	0	0	0
0.2% Land Area	100%		
NC	5,445	na	na
% Land Area	100%		
MU	7,000	14,000	21,000
0.2% Land Area	10.2%	1.8%	21.6%

PARKING

Parking for all MMH shall be on-site and follow the standard city of Tucson zoning code parking requirements for residential use. It should be noted any property developed as a triplex or fourplex will be required to follow the commercial standards for developing the site - parking, landscape, and screening requirements become much more regulated. Access to the property will need be from a named street - no alley way access.

2 single family unit	4 spaces
3 or 4 units	Studio less than 400sf: 1 space
	Studio more than 400sf: 1.5 spaces
	2 bedroom: 2 spaces
	3 bedroom: 2.25 spaces
	4 or more bedroom: 2.5 spaces

HEIGHT AND SETBACKS

Zone	Street Yard	Side Yard	Height	Bldg Cvge
R2	20'	6' or 2/3H	25'	70/75%
R3	20'	6' or 2/3H	40'	70%
MH2	20'	6' or 2/3H	25'	75%
O1	20'	10' or 3/4H	16'	70%
O2	20'	10' or 3/4H	26'	70%
O3	20'	10' or 3/4H	25'	75%
C1	20'	10' or 3/4H	25'	75%
C2	20'	10' or 3/4H	40'	70%
C3	20'	1.5H or 0	75'	80%
OCR1	20'	1.5H or 0	140'	80%
OCR2	20'	1.5H or 0	300'	80%
NC	20'	10' or 3/4H	16'	70%
MU	20'	10' or 3/4H	25'	70/75%

UTILITIES

If the MMH project has separate addresses for the units, then separate electric meters are required (1 address = 1 electric meter). If the project is composed of separate buildings - two duplexes or 1 duplex and 1 single family residence, then separate gas meters are required (1 building = 1 gas meter). Only one water meter is required for a project regardless of addresses or number of buildings.

PROCESS

The process to obtain a building permit for a duplex used as rental property requires the property owner to engage a licensed architect. If the project has 3 or more units, the project will be required to be reviewed as a commercial property requiring additional development documents.

PIMA COUNTY

Except for SH and CR3, MMH is allowed in most residential zones of Pima County. The minimum square footage allowed for each site is reduced, though, allowing for more density. For duplexes and triplexes, the county will review the project as a standard residential project. For fourplexes, the county will require the project to be reviewed as a “commercial” project, requiring civil engineers and architects to produce documents for review.

ZONE, NUMBER OF UNITS, LOT AREA

The following table provides the requirements for an MMH within zones that allow residential use within Pima County.

Zone	Required Lot Area		
	Duplex	Triplex	Fourplex
CR4	7,000	10,500	14,000
0.09% Land Area	19%	5%	57%
CR5	6,000	6,000	6,000
0.09% Land Area	86%	86%	86%
Dwelling unit must be a minimum 2,000 square feet			
TR	10,000	10,000	10,000
0.06% Land Area	72%	72%	72%
Dwelling unit must be a minimum 1,000 square feet			
MU	7,000	10,500	14,000
0.03% Land Area	12%	3%	68%
CB1 and 2	10,000	10,000	10,000
0.05% Land Area	92%	92%	92%
Dwelling unit must be a minimum 1,000 square feet			

PARKING

Parking for all MMH shall be on-site and follow the standard Pima County zoning code parking requirements for residential use:

1 bedroom	1 space
2 bedroom	1.5 spaces
3 bedroom	2 spaces
4 bedroom	2.5 spaces

HEIGHT AND SETBACKS

Zone	Front Yard	Side Yard	Rear Yard	Height	Stories	Bldg Cvrage
CR4	20'	10'	10'	34'	-	50%
CR5	20'	10'	10'	34'	-	50%
TR	20'	7'	25'	34'	-	na
MU	20'	7'	25'	34'	2	na
CB1	20'	7'	20'	34'	-	na
CB2	20'	7'	20'	39'	-	na

UTILITIES

If the MMH project has separate addresses for the units, then separate electric meters are required (1 address = 1 electric meter). If the project is composed of separate buildings - two duplexes or 1 duplex and 1 single family residence, then separate gas meters are required (1 building = 1 gas meter). Only one water meter is required for project regardless of addresses or number of buildings.

PROCESS

Three units or under, the process could be relatively simple - as simple as a single family home project. If a property owner is going to have more than 3 units on a property, then the property is treated as a “commercial” project, requiring an engineer to produce development plan documents for the property. If the project is greater than 3,000 square feet or has more than 20 people occupying the structure, a licensed architect is required.

SOUTH TUCSON

The development of MMH is allowed for in the South Tucson zoning code except for SR1.

ZONE, NUMBER OF UNITS, LOT AREA

The following table provides the requirements for MMH within zones that allow residential use within the city of South Tucson.

Zone	Required Lot Area		
	Duplex	Triplex	Fourplex
SR2	6,000	9,000	12,000
11% Land Area	70%	41%	21%
SR3	6,000	9,000	12,000
0.01% Land Area	90%	0%	0%
SB1/SB2	0	0	0
11% Land Area	100%	100%	100%
SB2A	6,500	6,500	6,500
500 SF MINIMUM BUILDING AREA FOR RESIDENTIAL USE			
12% Land Area	94%	94%	94%

PARKING

Parking for all ADU's shall be on-site and follow the standard city of South Tucson zoning code parking requirements for residential use:

1 unit	2 spaces
2 unit	4 spaces
3 unit	6 spaces
4 unit	8 spaces
etc	

HEIGHT AND SETBACKS

Zone	Front Yard	Side Yard	Rear Yard	Height	Stories	Bldg Cvrage
SR2	15'	6'	15'	25'	2	?
SR3	15'	6'-8'	20'	40'	-	?
SB1	15'	?	20'	30'	2	na
SB2A	15'	7'	20'	35'	-	na
SB2	0'	0'	25'	75'		

UTILITIES

If the MMH project has separate addresses for the units, then separate electric meters are required (1 address = 1 electric meter). If the project is composed of separate buildings - two duplexes or 1 duplex and 1 single family residence, then separate gas meters are required (1 building = 1 gas meter). Only one water meter is required for project regardless of addresses or number of buildings.

PROCESS

There are no specific processes a property owner is required to go through if they wish to construct MMH on a site where the zone allows.

TOWN OF ORO VALLEY

While the town of Oro Valley includes “duplex” in the list of defined terms, the word does not appear elsewhere in the code. Dwelling units, attached, including Condominium, Patio Home, or Townhouse are notes in the Residential use category. These developments are allowing only in the “Multi-Family” zones of R-4, R-S, and R-6. (R-4R is specifically for resorts).

ZONE, NUMBER OF UNITS, LOT AREA

The following table provides the requirements for an ADU within zones that allow residential use within the town of Oro Valley.

Zone	Required Lot Area		
	Duplex	Triplex	Fourplex
R-4	1 ACRE	1 ACRE	1 ACRE
	1 DWELLING PER 5,450 SF OF LAND		
3% Land Area	24.9%	24.9%	24.9%
R-6	5 ACRE	5 ACRE	5 ACRE
	1 DWELLING PER 3,500 SF OF LAND		
0.7% Land Area	64%	64%	64%
R-S	10,900	16,350	21,800
0.4% Land Area	0.4%	4.9%	65.1%

PARKING

Parking for all ADU's shall be on-site and follow the standard Oro Valley zoning code parking requirements for residential use:

1 dwelling	2 spaces
	2 guest spaces

HEIGHT AND SETBACKS

Zone	Front Yard	Side Yard	Rear Yard	Height Stories	Bldg Cvrage
R-4				25'	
R-6				25'	
R-S				25'	

UTILITIES

If the MMH project has separate addresses for the units, then separate electric meters are required (1 address = 1 electric meter). If the project is composed of separate buildings - two duplexes or 1 duplex and 1 single family residence, then separate gas meters are required (1 building = 1 gas meter). Only one water meter is required for project regardless of addresses or number of buildings.

PROCESS

There are no specific processes a property owner is required to go through if they wish to construct MMH on a site where the zone allows.

MANUFACTURED HOUSING, TINY HOMES, MOBILE HOMES OVERVIEW

Manufactured Homes are generally allowed, Mobile Homes are a thing of the past, and Tiny Homes are not specifically addressed in the zoning codes except for Pima County.

Generally, Manufactured Homes or Factory Built housing is permitted in every zone in the metropolitan area except for R-1 in the city of Tucson and CR1 & 2 and SR 1 & 2 in Pima County. For information on the regulations for Manufactured Homes, please see the earlier sections on ADU's and MMH.

Mobile Homes are only allowed either temporarily in specific zones or permanently in zones specific for Mobile Homes, for which there is very little percentage of area. They are not allowed in Oro Valley. The small percentage of mobile home sites in South Tucson are nonconforming and technically do not allow mobile homes!

Tiny Homes built on a chassis are considered trailers. Only the RV zone in the city of Tucson allows this type of structure and Pima County permits it in a handful of zones. South Tucson restricts these to the SMH zone and Oro Valley does not recognize it as an allowable structure.

Tiny Homes built on a chassis, but permanently attached to a foundation are allowed in a few more zones in the city of Tucson and Pima County, are recognized as Manufactured Housing in Oro Valley, and South Tucson has no restriction.

Parking for this type of housing is similar to site built, permanently attached housing.

In general, the documents for the construction of Manufactured Housing, Mobile Homes, and Tiny Homes will need to be prepared by a licensed architect or engineer. Most jurisdictions require a special process for the permitting process of manufactured housing.

MOBILE UNIT/MANUFACTURED HOME PROBABLE PROJECT COSTS

Project costs are difficult to forecast. Therefore, the associated costs for developing a project are presented with conservative numbers. The costs for a mobile home, manufactured housing, or tiny home are more variant and hard to determine because of the number of available suppliers and the shipping costs. Usually, the engineering for the manufactured housing, be it mobile or not, is included in the cost of the structure. Typically, the owner will be required to provide a foundation for the housing and this will require the services of an engineer or architect.

2000 SQUARE FOOT MOBILE UNIT / MANUFACTURED HOUSE

Architecture and Engineering	VARIES
Plan Review	88 (PC) 1,397 (CT) incl below (CST) 1,519 (OV)
Permit	3,972 (PC) 2,794 (CT) 1,400 (CST) 2,338 (OV)
Impact Fee	6,577 (PC) 8,100 (CT) 0 (CST) 3,156 (OV)

Construction Cost VARIES

Other costs that may be associated with the project:

SURVEY

GEOTECHNICAL ENGINEERING (GROUND MATERIAL)

UTILITY CONNECTIONS

SEWER CONNECTION FEE

WATER METER UPSIZE

SITE IMPROVEMENTS

LANDSCAPING

DRIVEWAYS AND OTHER HARDSCAPING

FINANCING

Financing for the construction of Tiny Homes, Mobile Homes, or Manufactured Homes would more than likely be available through local community banks and private lenders. The developer will need to make sure all land entitlements are in place (proper zoning, floodplain, etc.) and it is important the developer has a performance record of bringing housing to market with a debt payment history. It is also imperative the lender can work with an appraiser to properly value the project.

CITY OF TUCSON

Tiny Homes, Mobile Homes, and Manufactured Homes are transportable structures used for residential occupation. The city of Tucson does not have language in regards to Tiny Homes, but defines Mobile Homes and Manufactured Homes in the following manner:

Mobile Home: A nonmotorized dwelling, transportable in one or more sections, constructed on a permanent chassis with wheels, suitable for year-round residential occupancy and requiring the same method of water supply, waste disposal, and electrical service as a site-built dwelling. Mobile home does not mean a recreational vehicle. Manufactured housing units that do not meet the criteria provided in Section 11.3.7.A.5, Manufactured Housing, and house trailers are considered mobile home dwellings.

Manufactured Housing: A multisectional mobile home dwelling manufactured after June 15, 1976, to standards established by the U.S. Department of Housing and Urban Development that has external dimensions of at least 24 feet by 40 feet and is installed on a permanent foundation. A manufactured housing unit is considered equivalent to a single-family dwelling. To be considered a manufactured housing unit under this UDC, a wall must be installed continuously, except for ventilation and access, along the entire perimeter of the unit between the unit and the ground to give it the appearance of a site-built house. The wall must be of masonry construction or similar material. The tongue, axles, transporting lights, and towing apparatus must be removed before occupancy.

If a Tiny Home is to be placed on a site permanently, it will be considered as a structure. It does not meet the specific criteria as stated in the Manufactured Housing definition, but would probably be considered as manufactured housing. If a Tiny Home is to be placed on a site and still retain its mobility, then it will be considered an RV.

ZONE, NUMBER OF UNITS, LOT AREA

The following table provides the requirements for Mobile Homes and Tiny Homes within zones that allow residential use within the city of Tucson. Manufactured Housing is allowed in all zones where dwelling is allowed except for R-1. See the section on Accessory Dwelling Units for the regulations for Manufactured Housing.

Zone	Required Lot Area	
	Min Lot Area	Density
MH-1	7,000	8 units per acre (1 PER 5445)
3.8% Land Area	25.5%	
MH-2	5,000	15 units per acre (1 PER 2904)
0.2% Land Area	75.3%	
RV	7,000	8 units per acre (1 per 5445)
0.1% Land Area	100%	

PARKING

Parking for all mobile units or manufactured housing shall be on-site and follow the standard city of Tucson zoning code parking requirements for residential use:

1 single family unit	2 spaces
2 single family unit	4 spaces
3 or 4 units	Studio less than 400sf: 1 space
	Studio more than 400sf: 1.5 spaces
	2 bedroom: 2 spaces
	3 bedroom: 2.25 spaces
	4 or more bedroom: 2.5 spaces

HEIGHT AND SETBACKS

Zone	Street Yard	Side Yard	Height	Bldg Cvge
MH1	20'	6' or 2/3H	25'	70%
MH2	20'	6' or 2/3H	25'	75%
RV	20'	10' or 3/4H	16'	70%

UTILITIES

Mobile housing and manufactured housing shall connect to utilities with the same requirements as for site built and permanent housing.

PROCESS

The process is similar to site built and permanent housing, although a registrant must seal the documents for the dwelling.

PIMA COUNTY

Tiny Homes, Mobile Homes, and Manufactured Homes are transportable structures used for residential occupation. Pima County does not have language in regards to Tiny Homes, but define Mobile Homes and Manufactured Homes in the following manner:

Mobile Home: A transportable structure suitable for year-round single-family occupancy and having water, electrical, and sewage connections similar to those of conventional dwellings; this definition applies only to units constructed prior to June 15, 1976. Compare with manufactured home.

Manufactured Home: A structure transportable in one or more sections which:

1) In the traveling mode, is at least eight body feet in width or forty body feet in length, or, when erected on a site, is three hundred twenty or more square feet, and

2) Is built on a permanent chassis, and

3) Is designed to be used as a dwelling, with or without a permanent foundation, when connected to the required utilities, which include the plumbing, heating, cooling, and electrical systems contained therein;

b. This definition applies only to units constructed after June 15, 1976, except that this term shall include any structure which meets all the requirements of the definition except the size requirements, provided such structure has received a special size reduction certificate pursuant to Section 603(b) of the Housing and Community Development Act of 1974, as may be amended.

Factory built (modular) building: A residential or nonresidential building including a dwelling unit or habitable room thereof which is either wholly or in substantial part manufactured at an off-site location to be assembled on site, except that it does not include a manufactured home, a multisectional manufactured home, trailer, recreational vehicle or mobile home, as defined in A.R.S. Section 41-2142 and this code. A factory built building includes all the plumbing, heating, cooling and electrical systems of the building and shall bear the Arizona insignia of approval for factory-built building pursuant to A.R.S. Section 41-2142. Factory built buildings are allowed, but they are not allowed to move; they must be designed only for installation on a site-built permanent foundation.

In general, any housing that is mobile is limited to a specific area. Manufactured (factory built or modular) housing can be sited in most zones allowing residential occupation except for CR1 and SR. See the section on Accessory Dwelling Units for those regulations.

ZONE, NUMBER OF UNITS, LOT AREA

The following table provides the requirements for MOBILE HOMES within zones that allow residential use within Pima County. This set of regulations does not include the regulations required for the development of a mobile home park. TH,

IR, RH, GR-1 zones allow for mobile homes, but are not included in this report. The zones are either specifically designated for large scale mobile home or recreational vehicle sites or exist in rural Pima County.

Zone	Required Lot Area	
	Min Lot Area	Density
CMH-1	8,000	8 units per acre (1 per 5445)
0.01% Land Area	100%	
CMH-2	5,000	15 units per acre (1 per 2904)
0.01% Land Area	100%	
MU	SEE ACCESSORY DWELLING UNIT SECTION	
SH	SEE ACCESSORY DWELLING UNIT SECTION	

PARKING

PARKING

Parking for all MMH shall be on-site and follow the standard Pima County zoning code parking requirements for residential use:

1 bedroom	1 space
2 bedroom	1.5 spaces
3 bedroom	2 spaces
4 bedroom	2.5 spaces

HEIGHT AND SETBACKS

Zone	Front Yard	Side Yard	Rear Yard	Height	Stories	Blding Cvrge
CMH-1	20'	10'	10'	34'	-	50%
CMH-2	20'	10'	10'	34'	-	50%

UTILITIES

Mobile housing and manufactured housing shall connect to utilities with the same requirements as for site built and permanent housing.

PROCESS

The process is similar to site built and permanent housing, although a registrant must seal the documents for the dwelling.

SOUTH TUCSON

Tiny Homes, Mobile Homes, and Manufactured Homes are transportable structures used for residential occupation. The city of South Tucson does not have language in regards to Manufactured Homes, but define Mobile Homes and House Trailer in the following manner:

Mobile Home or House Trailer: means any unit used for living or sleeping purposes and designed to be equipped with wheels or similar devices for the purpose of transporting the unit from place to place, whether by motive power or by other means.

Mobile Homes or House Trailers are regulated to one zone only in the city of South Tucson - zone SMH - and it appears the all of zone SMH is nonconforming use.

ZONE, NUMBER OF UNITS, LOT AREA

The following table provides the requirements for MMH within zones that allow residential use within the city of South Tucson.

Zone	Required Lot Area		
	1 unit	2 unit	3 unit
SMH	6,500	13,000	18,500
0.001% Land Area	0%	0%	0%

PARKING

Parking for all mobile homes shall be on-site and follow the standard city of South Tucson zoning code parking requirements for residential use:

1 unit	2 spaces
2 unit	4 spaces
3 unit	6 spaces
4 unit	8 spaces
etc	

HEIGHT AND SETBACKS

Zone	Front Yard	Side Yard	Rear Yard	Height	Stories	Bldg Cvrage
SMH	20'	8'	20'	25'	2	?

UTILITIES

Mobile housing and manufactured housing shall connect to utilities with the same requirements as for site built and permanent housing.

PROCESS

The process is similar to site built and permanent housing, although a registrant must seal the documents for the dwelling.

ORO VALLEY

Tiny Homes, Mobile Homes, and Manufactured Homes are transportable structures used for residential occupation. The town of Oro Valley does not provide language in the zoning code for Tiny Homes, but has the following definitions for Manufactured Homes and Mobile Homes:

Manufactured Home: A structure, transportable in one (1) or more sections, which, in the traveling mode, is eight (8) feet or more wide or forty (40) feet or more in length, or when erected on site, is three hundred twenty (320) or more square feet, and which is built on a permanent foundation and contains plumbing, heating, air cooling, and electrical systems.

Mobile Home: A structure, transportable in one (1) or more sections, which, in the traveling mode, is eight (8) feet or more in width or forty (40) feet or more in length, or when erected on site is three hundred twenty (320) or more square feet and which is built on a permanent chassis and designed to be used as a dwelling.

Mobile Homes and Manufactured Homes are not identified in the Specific Use Table of the Oro Valley Zoning Code.

RECENT DEVELOPMENTS - ZONING REGULATIONS

CITY OF TUCSON

Staff in the planning department at the city of Tucson are currently directed by Mayor and Council to create an Accessory Dwelling Unit Ordinance. The city is currently convening a stakeholder group and engaging in community outreach to develop the appropriate standards for a code change.

PIMA COUNTY

The county recognizes the need to bring down housing costs and create higher density housing. The codes have a variety of processes allowing this, but they are highly underutilized mainly due to the number of hurdles one is required to jump during the process. When the question was asked to Pima County staff, they indicated there was interest within the county to look at innovative development possibilities along the recently completed 130 mile shared use path, The Loop.

CITY OF SOUTH TUCSON

There are no current developments in South Tucson to modify the regulations for the construction of ADU's, MMH, or mobile units.

TOWN OF ORO VALLEY

From 2016 to 2018 there was a movement within the planning office of the town of Oro Valley to increase density and create new town centers. This was met with opposition and has since been tabled. Otherwise, there are no efforts to modify the regulations for the construction of ADU's, MMH, or mobile units.

RECENT DEVELOPMENTS - GRASSROOTS ORGANIZATIONS

Tucson has a long history of individuals, non-profit organizations, and quasi-governmental offices championing affordable housing for individuals, families, and seniors.

A recent development is the creation of the Tucson Small Scale Development Coalition (SSDC). It is a group of community development professional and neighborhood leaders from Tucson and Phoenix on a mission to strengthen neighborhoods through an incremental approach to create new, local, small-scale developers, investors and the champions to support them.

The SSDC is the host committee responsible for bringing the Incremental Development Alliance, a 501c3 non-profit, to Tucson, AZ for a one-day workshop training locals in small scale real estate development. It is also facilitating studies in South Tucson investigating and identifying the barriers to small scale development.

Thrive in the 05 is a HUD funded Choice Neighborhoods program. It is a massive, multi-phase, multi-year, multi-million dollar project with private and public partnerships, architects and engineers, run through the Housing and Community Development office with the city of Tucson for the betterment of an area within the 85705 zip code. A component of the current Thrive in the 05 project is worth noting: the development of a “community storefront architecture office.” This is conceived as a service that allows people in the area to utilize the services of a professional to navigate the zoning and building codes of the city. Services would be funded through grants and the fees could be charged on a sliding scale.

RECENT DEVELOPMENTS - PROJECTS

The metropolitan area of Tucson is continually being developed by local, regional, and national development teams. The teams can be large scale companies or individuals. In general, it is easier to develop a property if you have capital and you have the resources to hire a team of people with specialized knowledge to assist you through the process. Most development projects are complicated no matter the scale. The following is a very short list, but broad spectrum, of recent projects that are offering housing that is currently underserved in the metropolitan area.

AVILLA CONSTRUCTION

A national company developing high density luxury rental homes targeting seniors. Projects attract three types of users - fulltime residents, annual lease residents, and seasonal use retirees. Projects range from 1000 to 1400 square feet. There are 4 sites in the metro Tucson area with +/-75 units per site. One site is 287,475 sf, making the density at +11 units per acre.

FEMALE VETERAN HOUSING

In the planning stages, the development group wishes to create a community based development for female veterans. The project will hope to include 45 housing units, day care, classroom space, office space, retail space, and outdoor space. The desire is to make it safe, community based, and affordable. The group has found roadblocks in the manufactured housing industry so has turned to incorporating a Tiny Home concept - either site built or factory built. They hope to be offering homes for \$30K.

CENTRAL BARRIO DEVELOPMENT

Developing mostly in the central core of Tucson, Central Barrio Development projects range from ground up to rehab, micro to market rate square feet. Their primary interest is in infill pieces underutilized near the downtown core; they are not interested in the large parcel, economies of scale, maximize density approach to development. Central Barrio Development is currently developing a 12,000 square foot C3 zoned lot with twenty 430 sf units. The group uses traditional sources for financing raising equity and borrowing the remainder from banks with whom they have a working relationship. Obstacles they run into include the time the city of Tucson takes to review projects and fire and trash access. The development company actively looks for C3 lots because they provide the most design options. The company believes there is a need for workforce housing near downtown (no commute). The company does not get involved with "affordable" housing as defined by FHA because it makes the projects too complicated.

CUADRO

A firm simultaneously trying to develop their own small scale projects promoting higher density, submitting for a national health equity grant with a goal to open the door for non-professionals for the design and construction of residential architecture, and promoting innovative and historic building materials that could be utilized for affordable housing.

BARRIO HISTORICO DUPLEX CONVERSION

I am including this as a proto-typical small scale development occurring in Tucson on which I am fortunate enough to be the architect. The development team consists of a mother and son. The son is currently enrolled at the University of Arizona. They decided to purchase a historic structure in Barrio Historico, south of downtown Tucson. The structure was a house for some time, but within the last 10 years or so, it functioned as a daycare. The general layout of the building is conducive of converting the structure to a duplex, allowing for an income for the son while he attends school.

Simple enough: renovate a historic residential single family dwelling into duplex unit. Unfortunately through a series of miscommunications between the property owner and city staff, the processes for converting the structure were not completely understood by both parties and the project experienced many delays. Can the code and process be written so the average citizen has command over the potential development of their property? Can planning staff be given the direction and time to more fully assist residential property owners in the understanding of code and process?

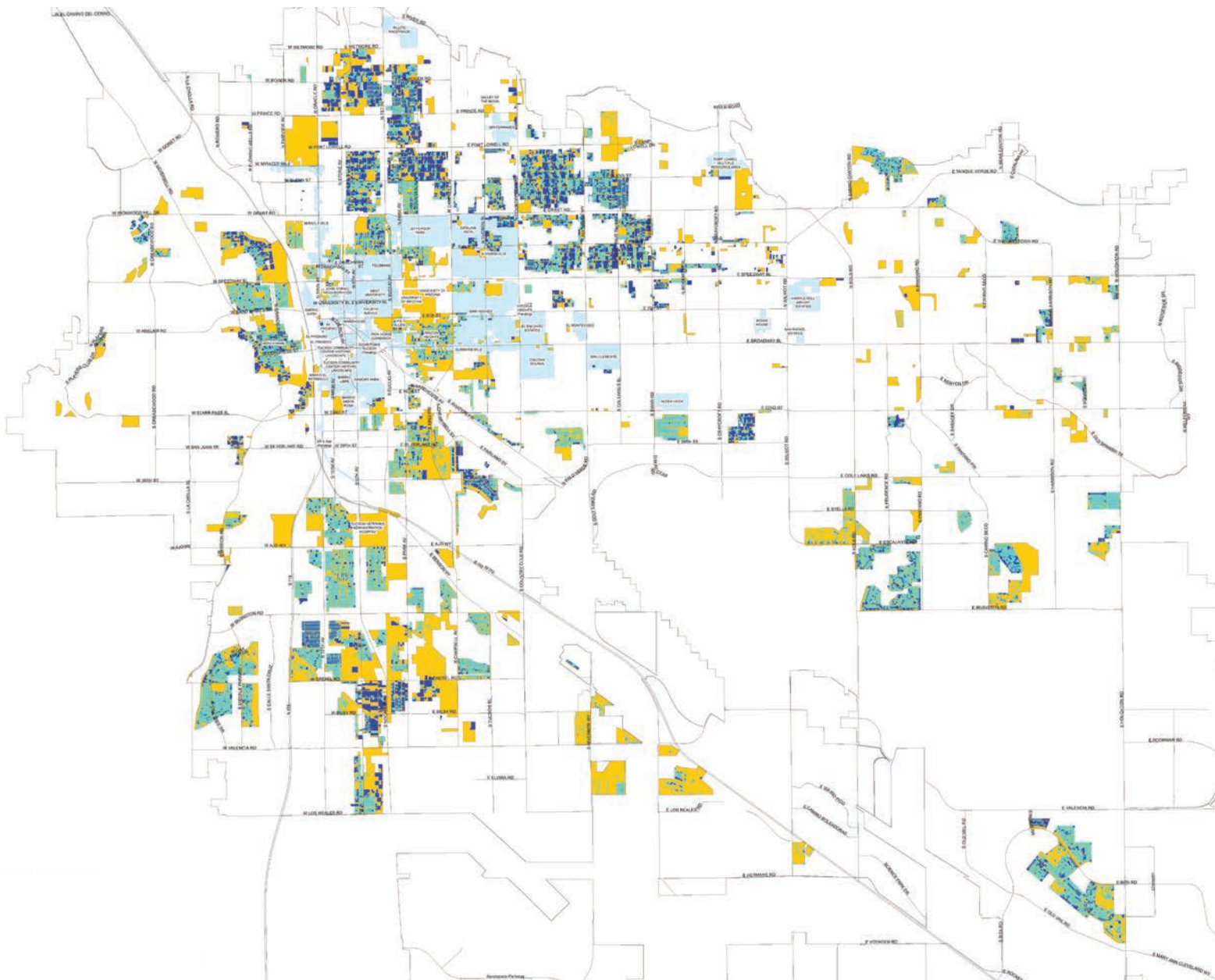
I AM U360

To offer a positive spin on a jurisdiction offering guidance for a project, Poster Frost McDonald Architects and city zoning staff developed a property with a cluster of 10 one bedroom units on a R-1 zone lot that was definitely under the required minimum lot square footage. Through creative interpretation of the code, the project is considered one large house (each unit does not technically have a kitchen). This is a case where the success of the project was dependent on the creative thinking and designing between city staff, specialists, and the developer.

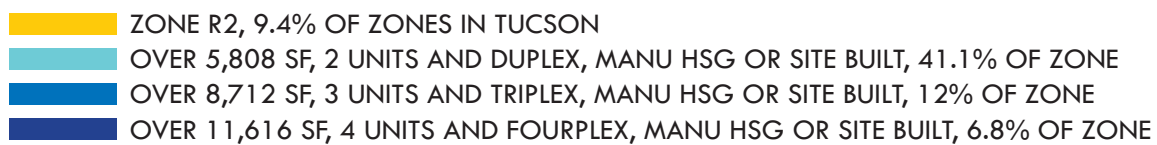
ZONING MAPS

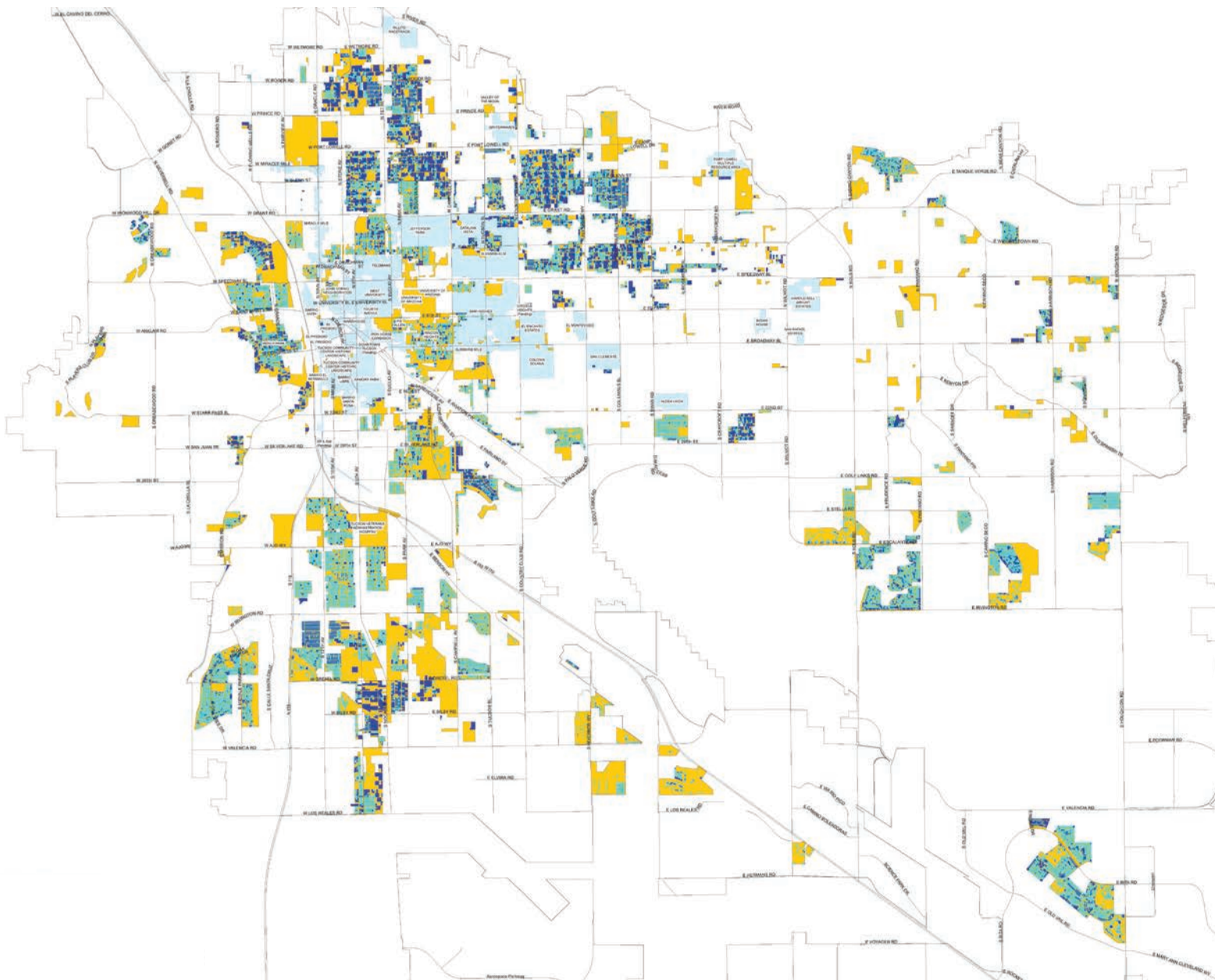
The following pages are maps of each zone within each jurisdiction included in this report. The maps indicate the zone and the allowable construction within that zone with percentages given. The purpose is to give one an overall visual display of the properties available for a particular type of development.





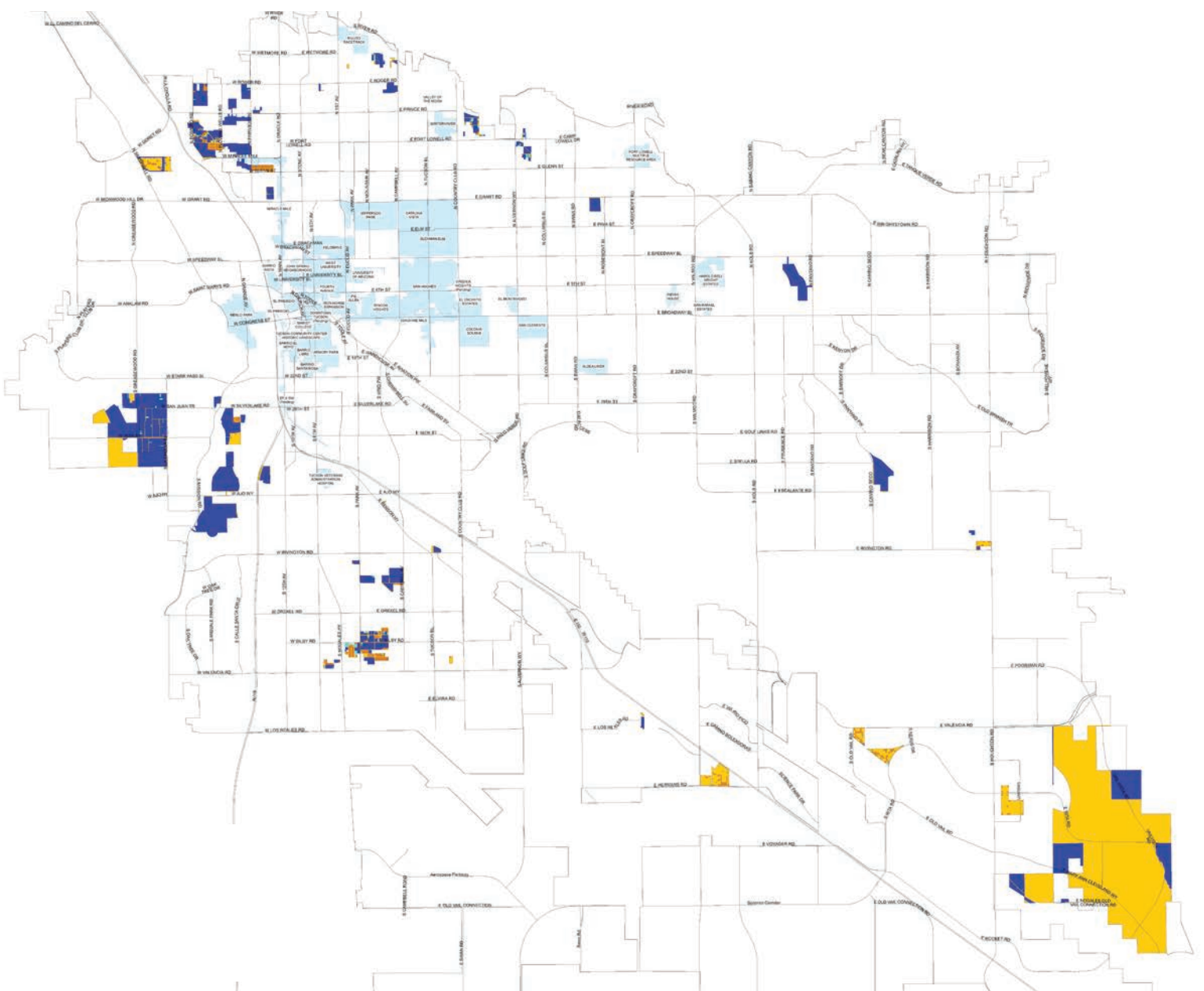
TUCSON - ZONE R2 RESIDENCE ZONE





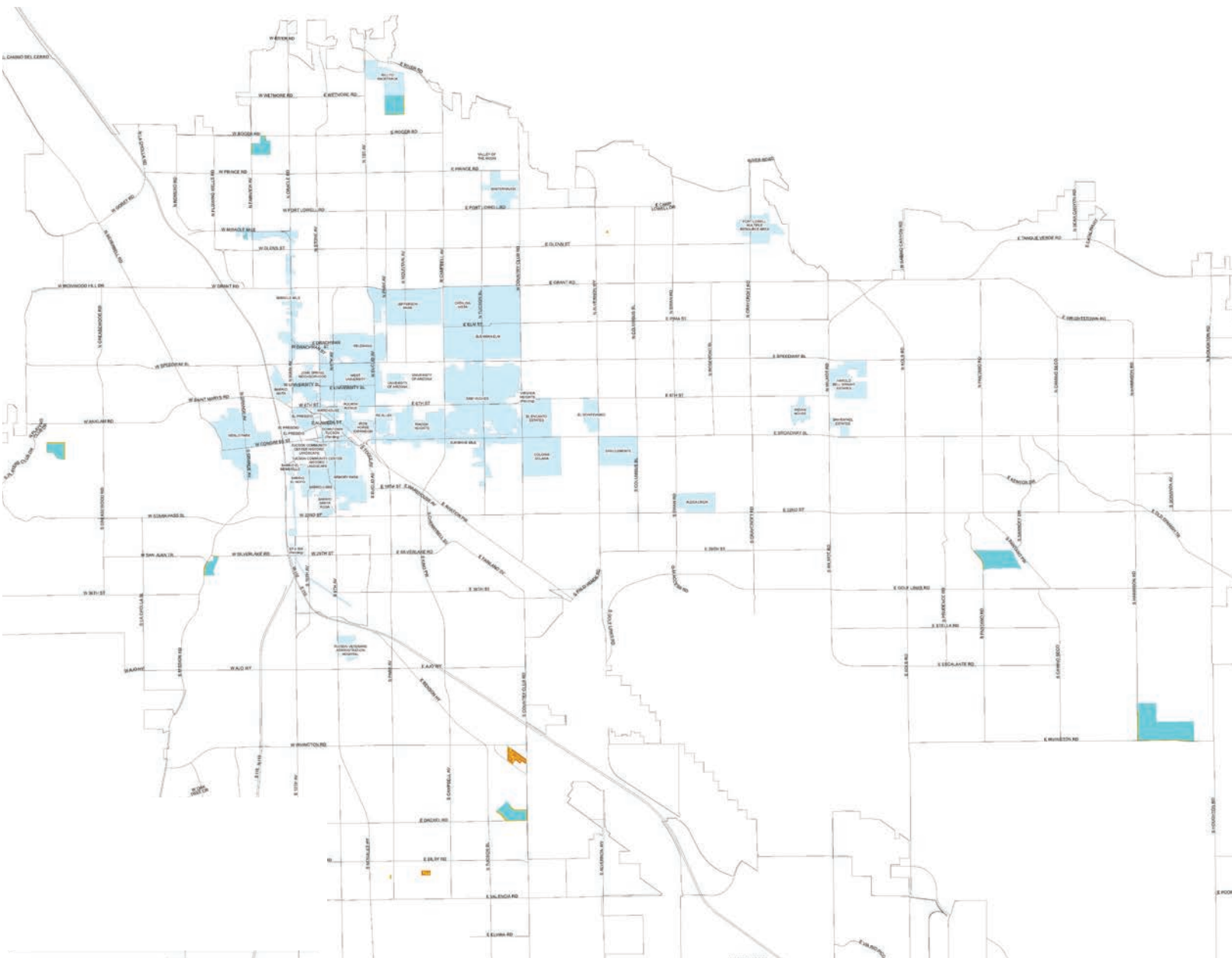
TUCSON - ZONE R3 RESIDENCE ZONE

- ZONE R3, 2.6% OF ZONES IN TUCSON
- OVER 5,000 SF, 2/3/4 UNITS AND DU/TRI/FOURPLEX, MANU HSG OR SITE BUILT, 37.2% OF ZONE



TUCSON - ZONE MH1 MOBILE HOME ZONE

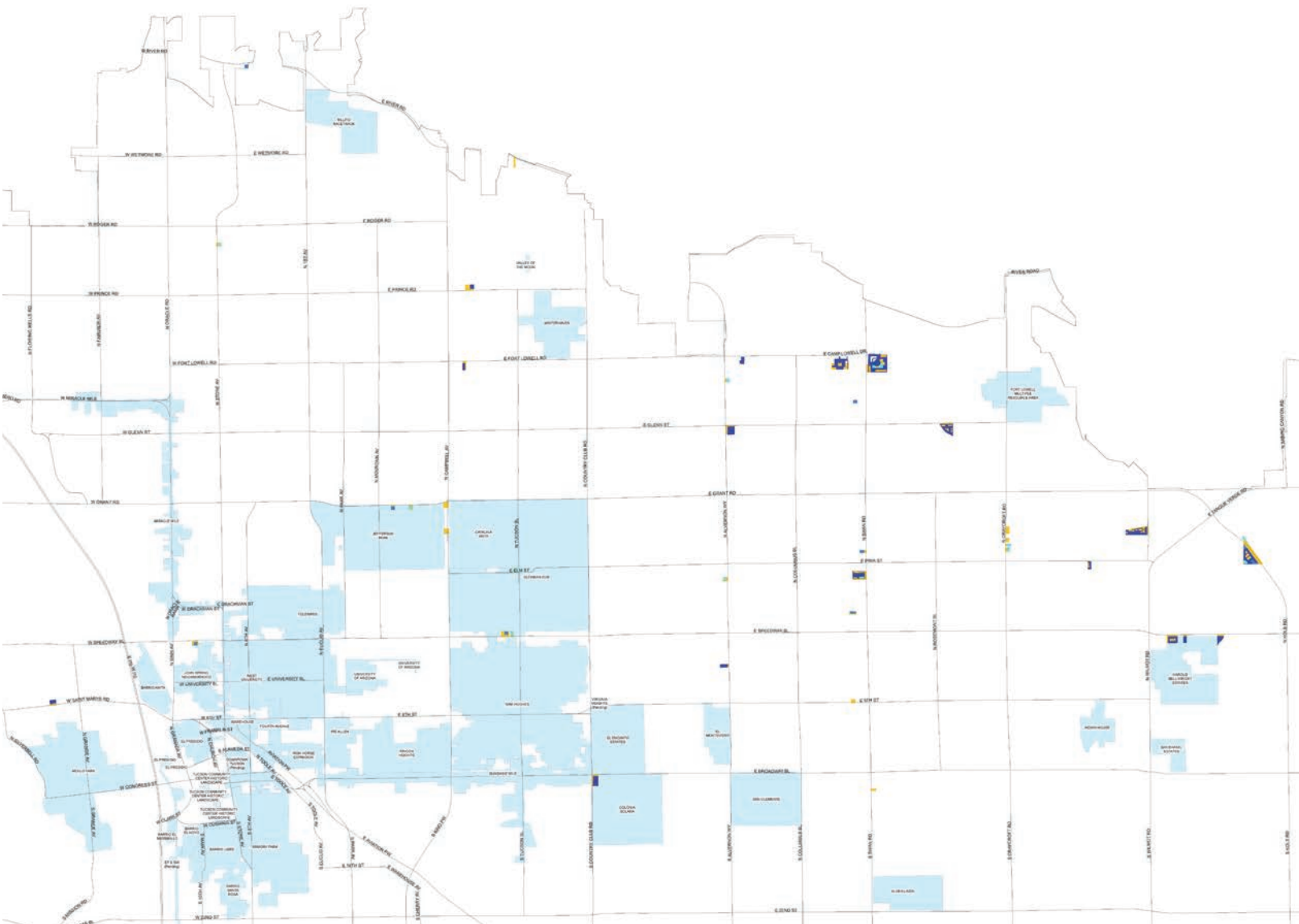
- ZONE MH1, 3.8% OF ZONES IN TUCSON
- OVER 14,000 SF, 2 UNITS AND DUPLEX, MANU HSG OR SITE BUILT, 2.5% OF ZONE
- OVER 21,000 SF, 2 UNITS AND DUPLEX, MANU HSG OR SITE BUILT, 1.7% OF ZONE
- OVER 28,000 SF, 2 UNITS AND DUPLEX, MANU HSG OR SITE BUILT, 16.5% OF ZONE
- OVER 7,000 SF, 8 MOBILE HOME UNITS PER ACRE, MANU HSG OR SITE BUILT, 25.5% OF ZONE



TUCSON - ZONE MH2 MOBILE HOME ZONE

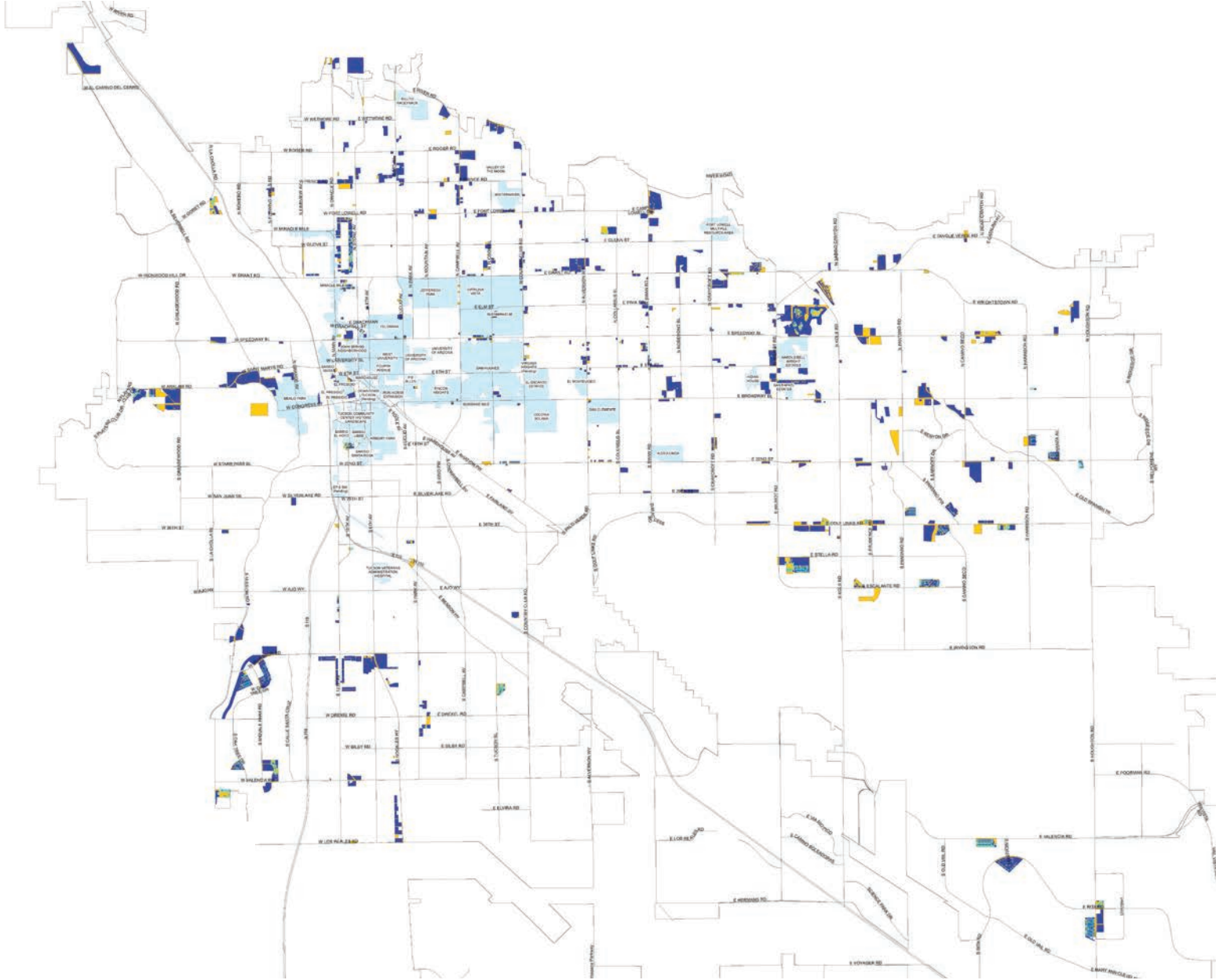
ZONE MH2, 0.2% OF ZONES IN TUCSON
 OVER 10,000 SF, 2 UNITS, MANU HSG OR SITE BUILT, 7.5% OF ZONE

OVER 5,000 SF, 15 MOBILE HOME UNITS PER ACRE, MANU HSG OR SITE BUILT, 75.3% OF ZONE



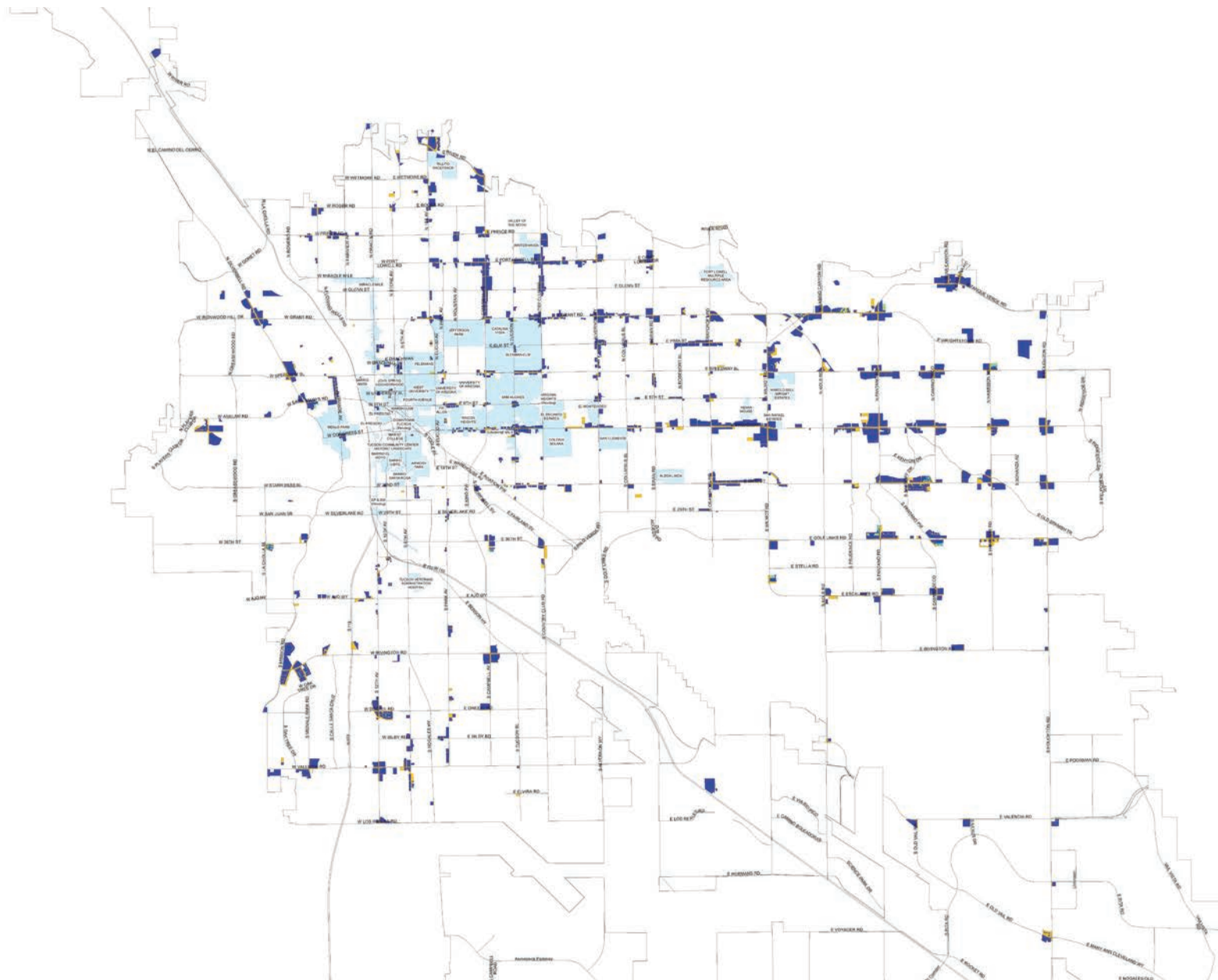
TUCSON - ZONE O1 AND O2 - OFFICE ZONE

- ZONE O1 AND O2, 0.04% OF ZONES IN TUCSON
- OVER 10,890 SF, 2 UNITS AND DUPLEX, MANU HSG OR SITE BUILT, 8.3% OF ZONE
- OVER 16,335 SF, 3 UNITS AND TRIPLEX, MANU HSG OR SITE BUILT, 5.4% OF ZONE
- OVER 21,780 SF, 4 UNITS AND FOURPLEX, MANU HSG OR SITE BUILT, 11.9% OF ZONE



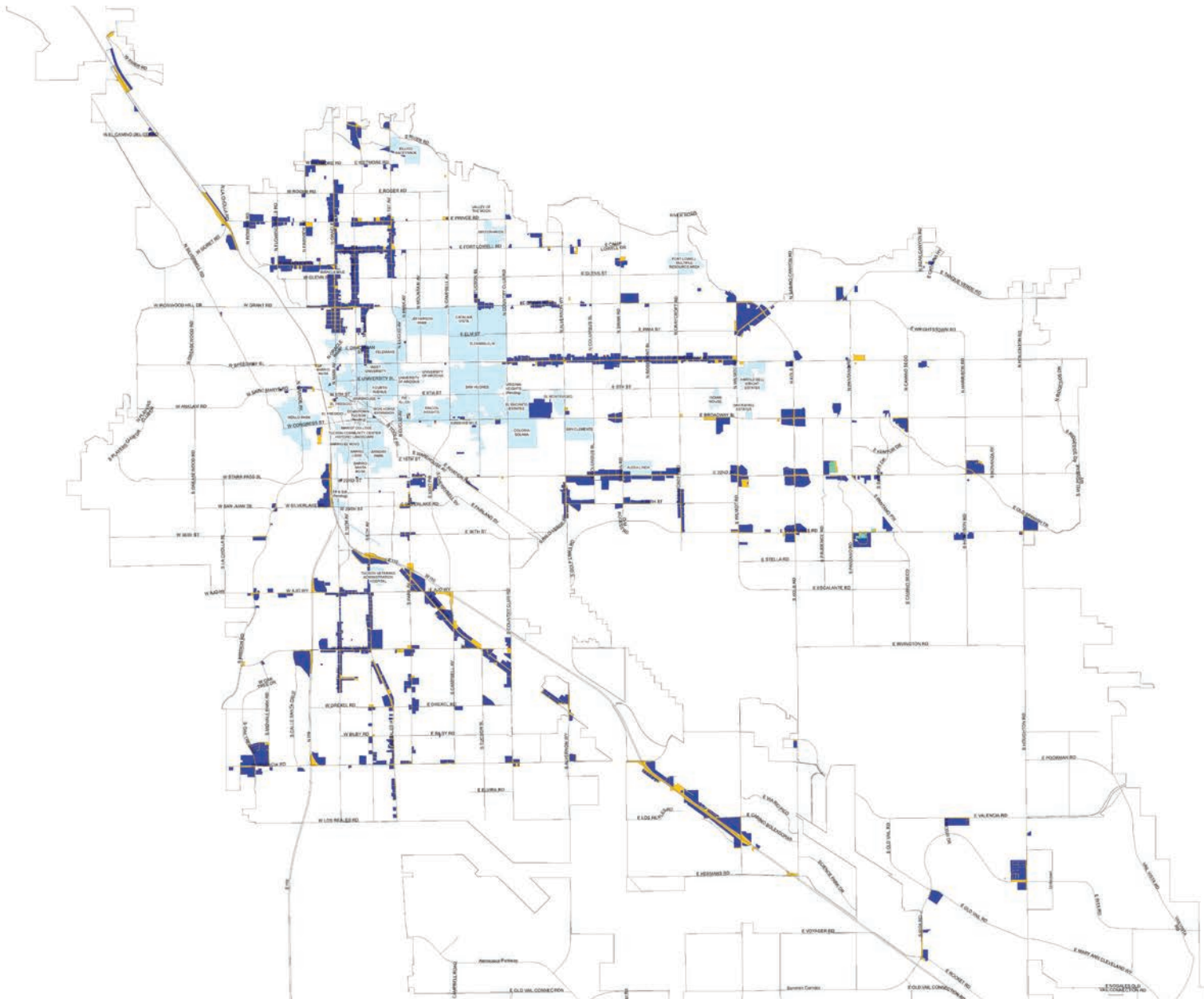
TUCSON - ZONE O3 - OFFICE ZONE

- ZONE O3, 1.8% OF ZONES IN TUCSON
- OVER 5,000 SF, 2 UNITS AND DUPLEX, MANU HSG OR SITE BUILT, 7.8% OF ZONE
- OVER 5,940 SF, 3 UNITS AND TRIPLEX, MANU HSG OR SITE BUILT, 15% OF ZONE
- OVER 7,920 SF, 4 UNITS AND FOURPLEX, MANU HSG OR SITE BUILT, 22.9% OF ZONE

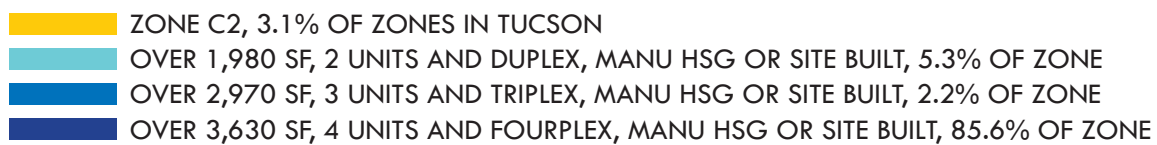


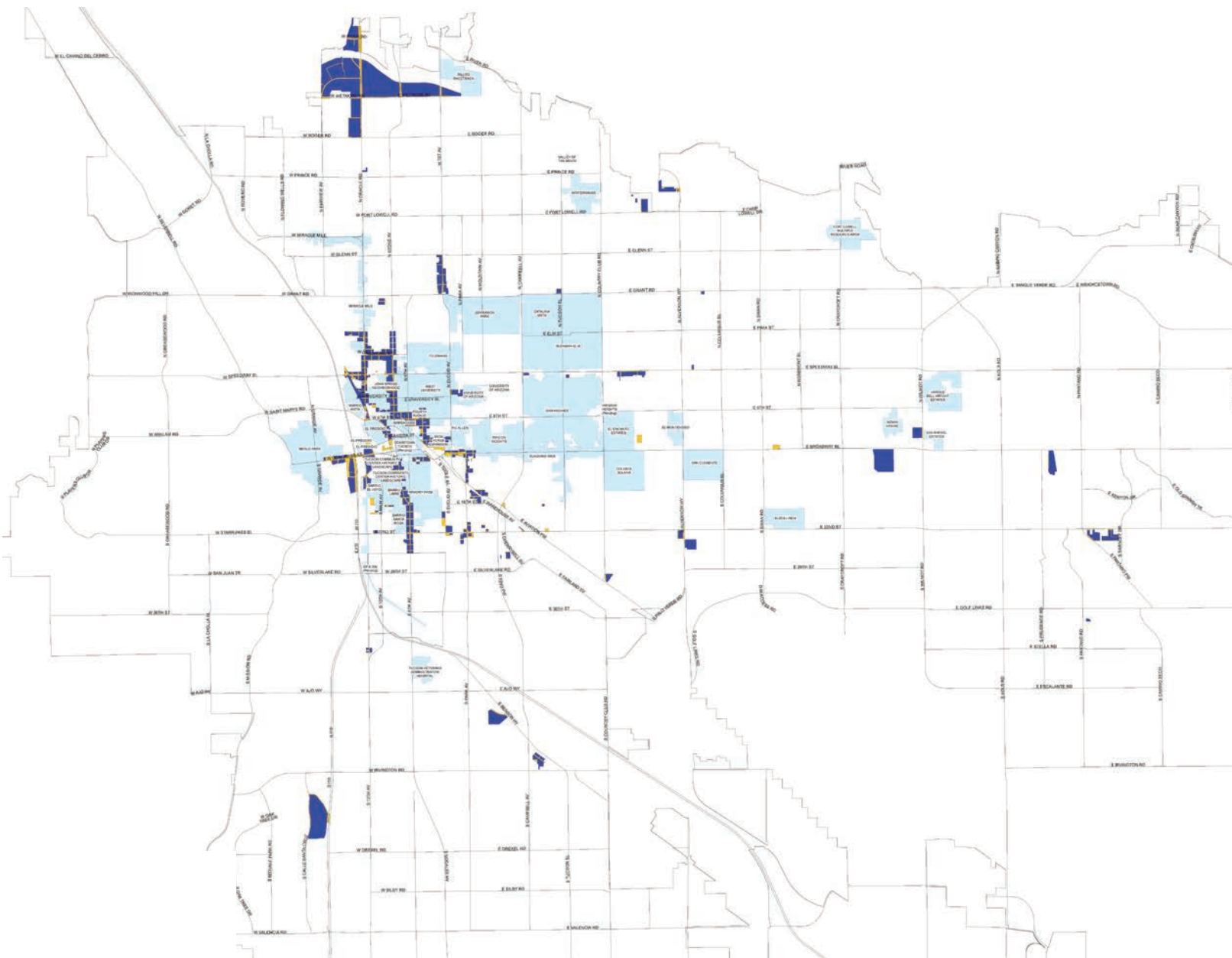
TUCSON - ZONE C1 - COMMERCIAL ZONE

- ZONE C1, 2.4% OF ZONES IN TUCSON
- OVER 2,420 SF, 2 UNITS AND DUPLEX, MANU HSG OR SITE BUILT, 6% OF ZONE
- OVER 3,630 SF, 3 UNITS AND TRIPLEX, MANU HSG OR SITE BUILT, 5.7% OF ZONE
- OVER 4,840 SF, 4 UNITS AND FOURPLEX, MANU HSG OR SITE BUILT, 65.5% OF ZONE

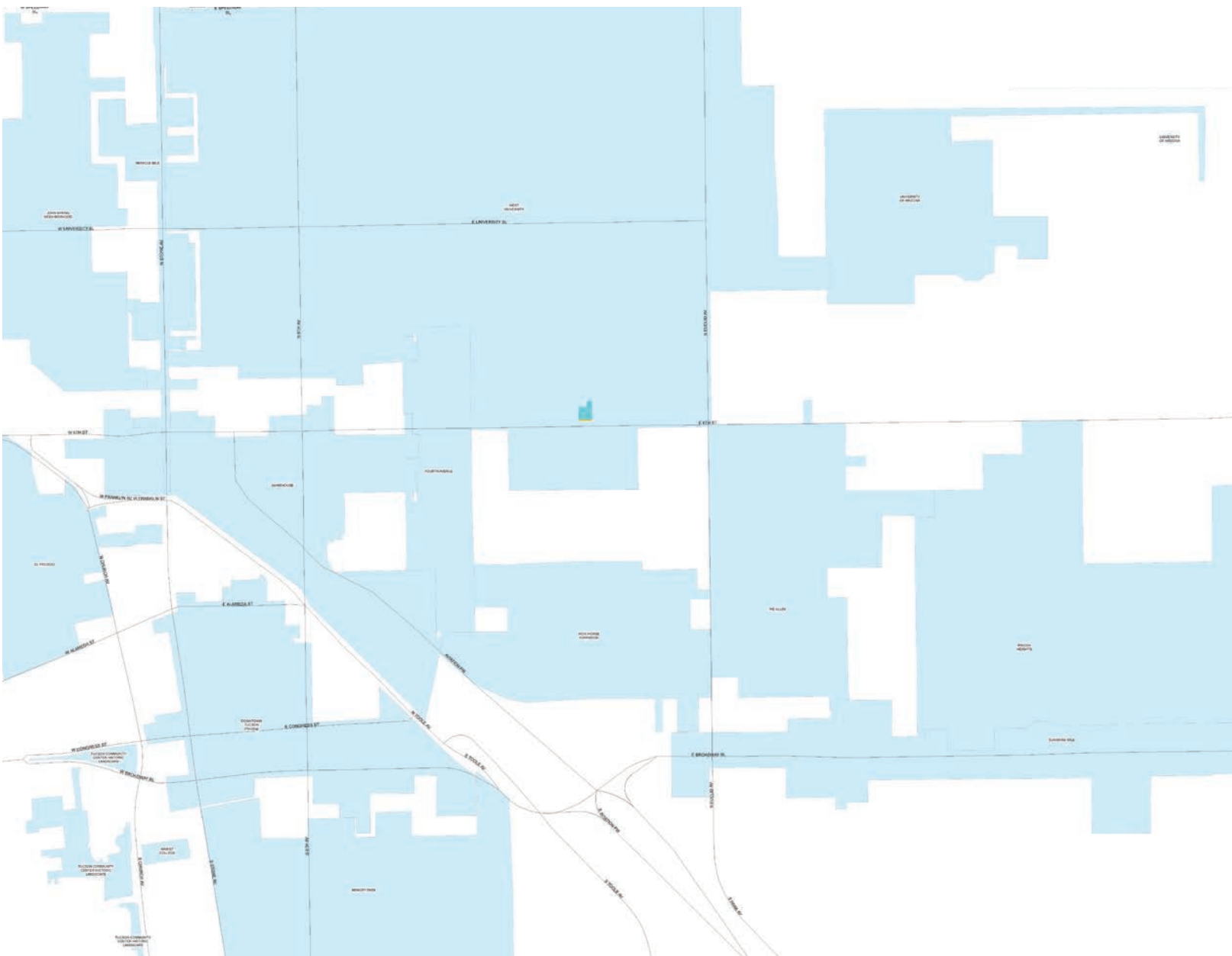


TUCSON - ZONE C2 - COMMERCIAL ZONE



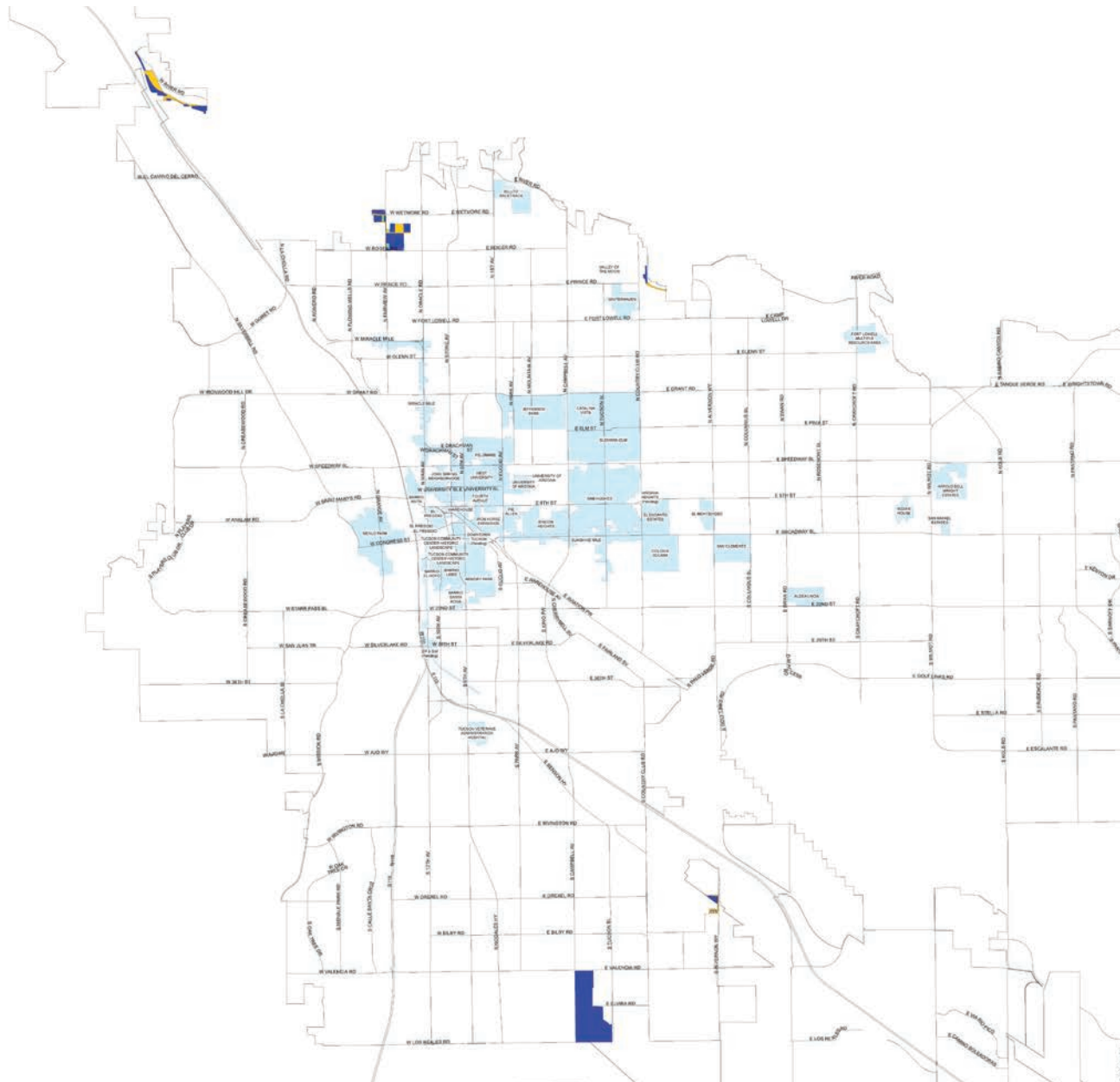


ZONE C3, 0.8% OF ZONES IN TUCSON
OVER 1,000 SF, 2 UNITS AND DUPLEX, MANU HSG OR SITE BUILT, 1.8% OF ZONE
OVER 1,500 SF, 3 UNITS AND TRIPLEX, MANU HSG OR SITE BUILT, 1% OF ZONE
OVER 2,000 SF, 4 UNITS AND FOURPLEX, MANU HSG OR SITE BUILT, 82% OF ZONE



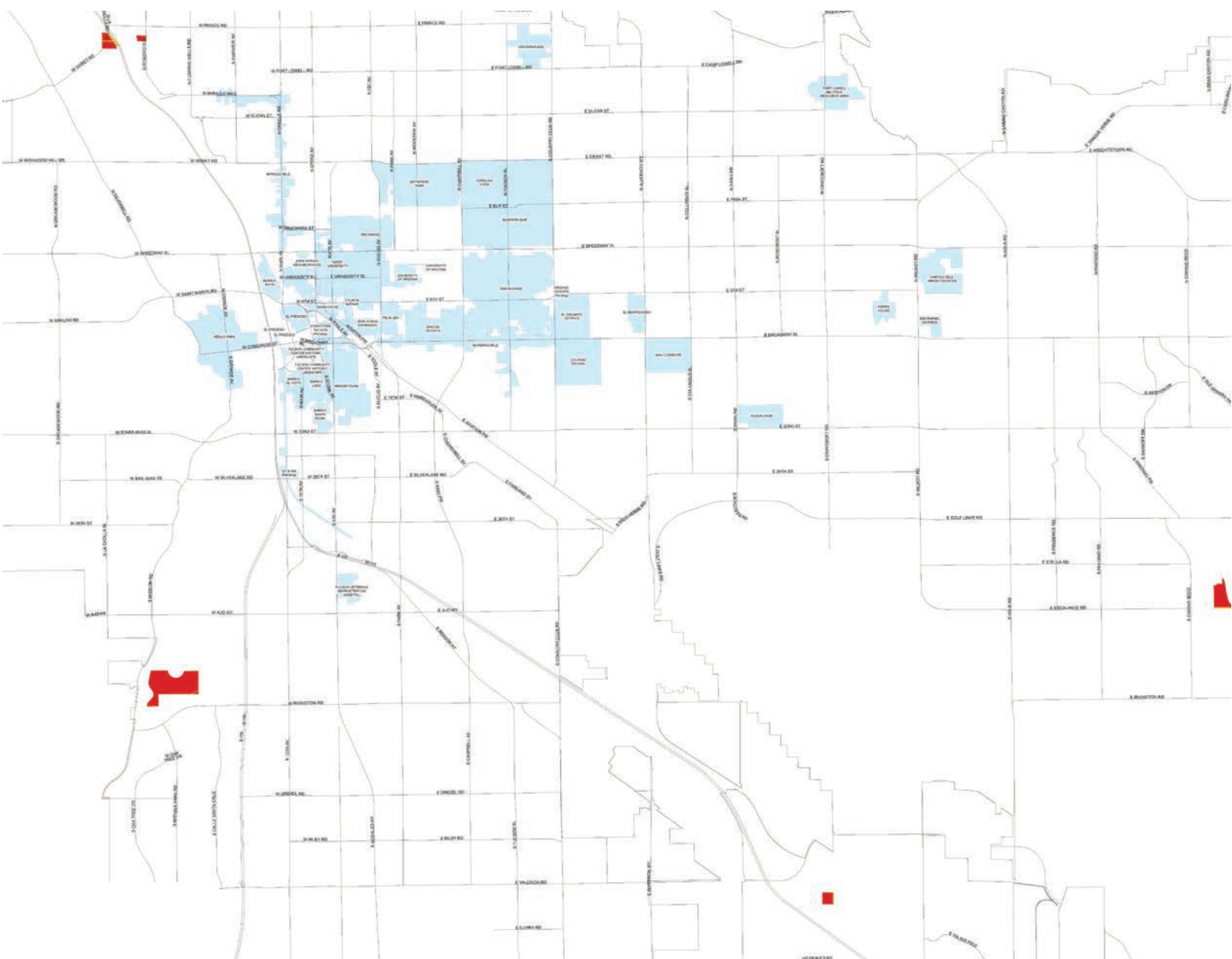
TUCSON - ZONE HNC - HISTORIC N'HOOD COMMERCIAL ZONE

- ZONE NC, 0.0001% OF ZONES IN TUCSON
- OVER 5,445 SF, 2 UNITS AND DUPLEX, MANU HSG OR SITE BUILT, 100% OF ZONE



TUCSON - ZONE MU - MIXED USE ZONE

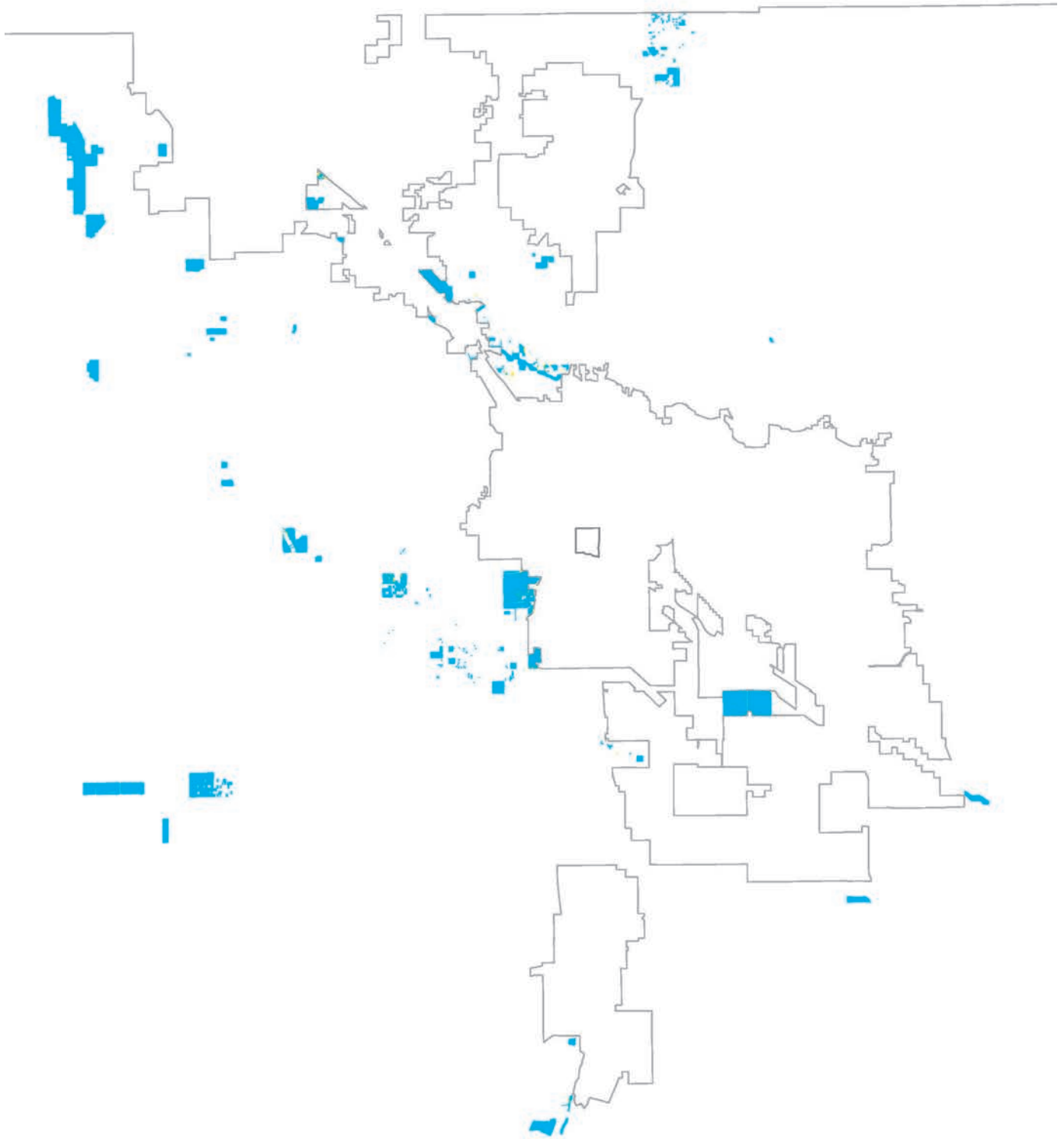
- ZONE MU, 0.2% OF ZONES IN TUCSON
- OVER 7,000 SF, 2 UNITS AND DUPLEX, MANU HSG OR SITE BUILT, 10.2% OF ZONE
- OVER 14,000 SF, 3 UNITS AND TRIPLEX, MANU HSG OR SITE BUILT, 1.8% OF ZONE
- OVER 21,000 SF, 4 UNITS AND FOURPLEX, MANU HSG OR SITE BUILT, 21.6% OF ZONE



TUCSON - ZONE RV - RECREATIONAL VEHICLE ZONE

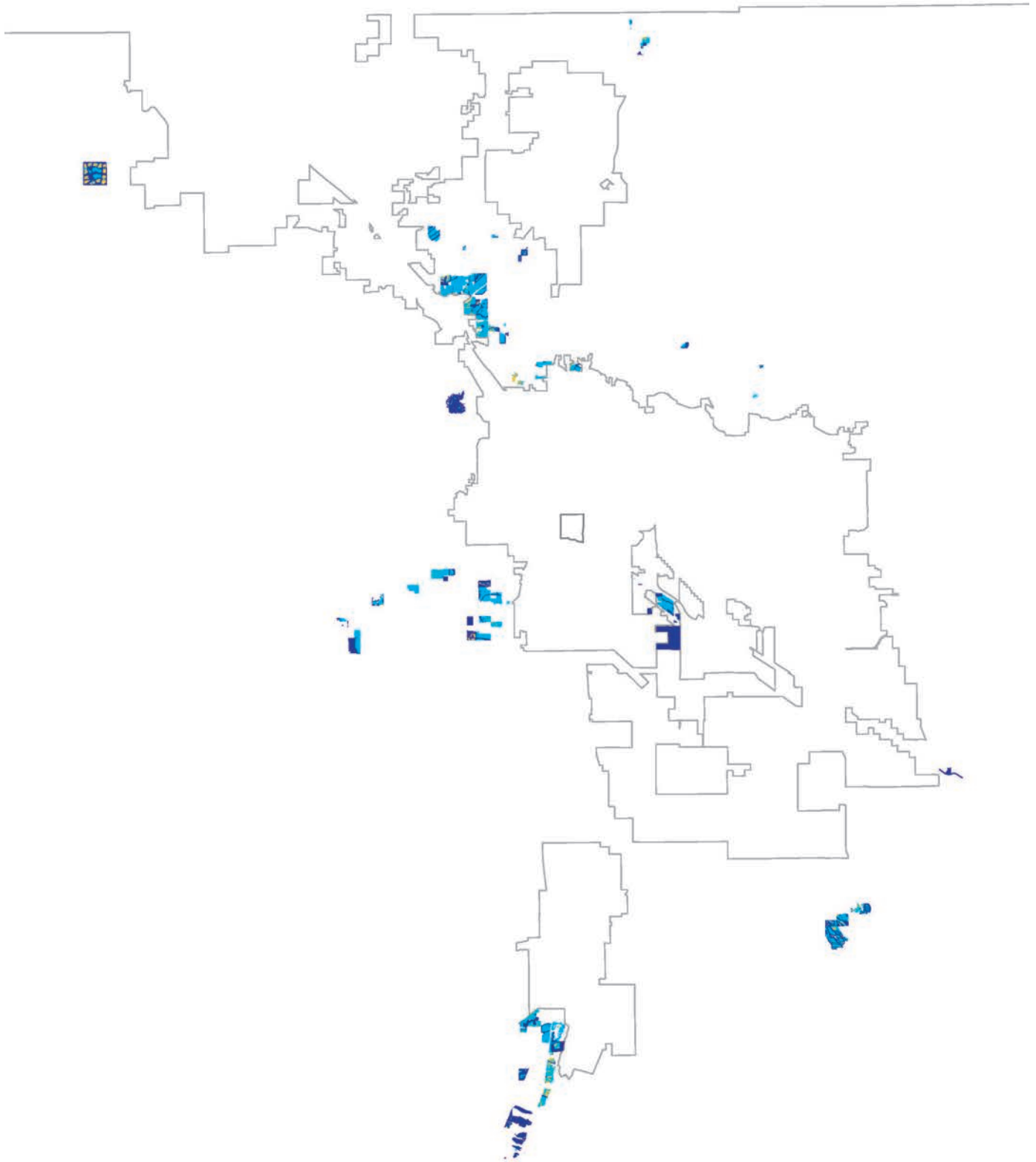
ZONE RV, 0.1% OF ZONES IN TUCSON

OVER 10,890 SF, 2 TINY HOMES (MOBILE UNITS), 100% OF ZONE
INNOVATIVE HOUSING EXAMINATION
JANUARY 2021



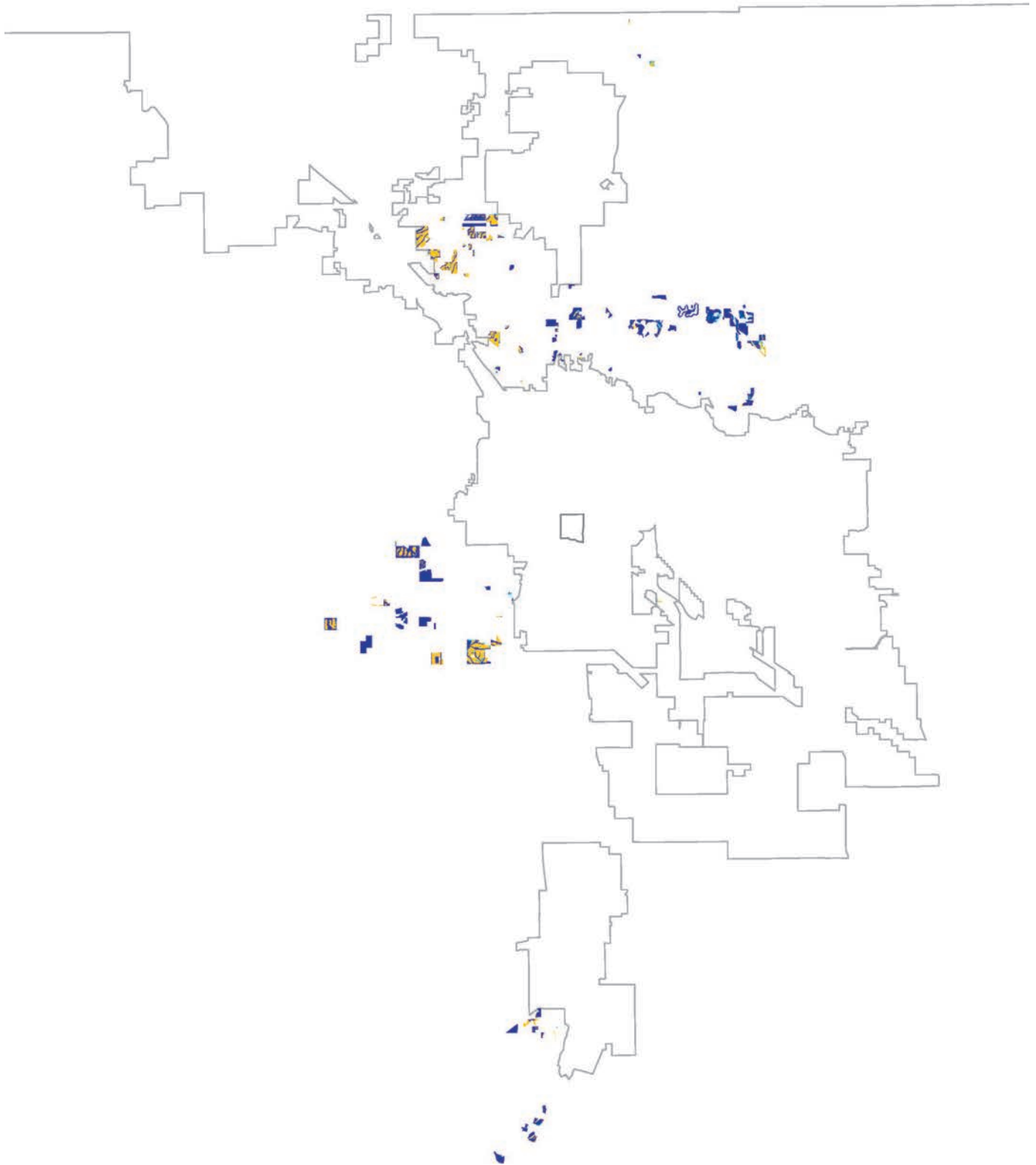
PIMA COUNTY - ZONE SH SUBURBAN HOMESTEAD SINGLE FAMILY DWELLINGS

- ZONE SH, .24% OF ZONES IN PIMA COUNTY
- OVER 36,000 SF, 2 UNITS FACTORY OR SITE BUILT, 98% OF SH



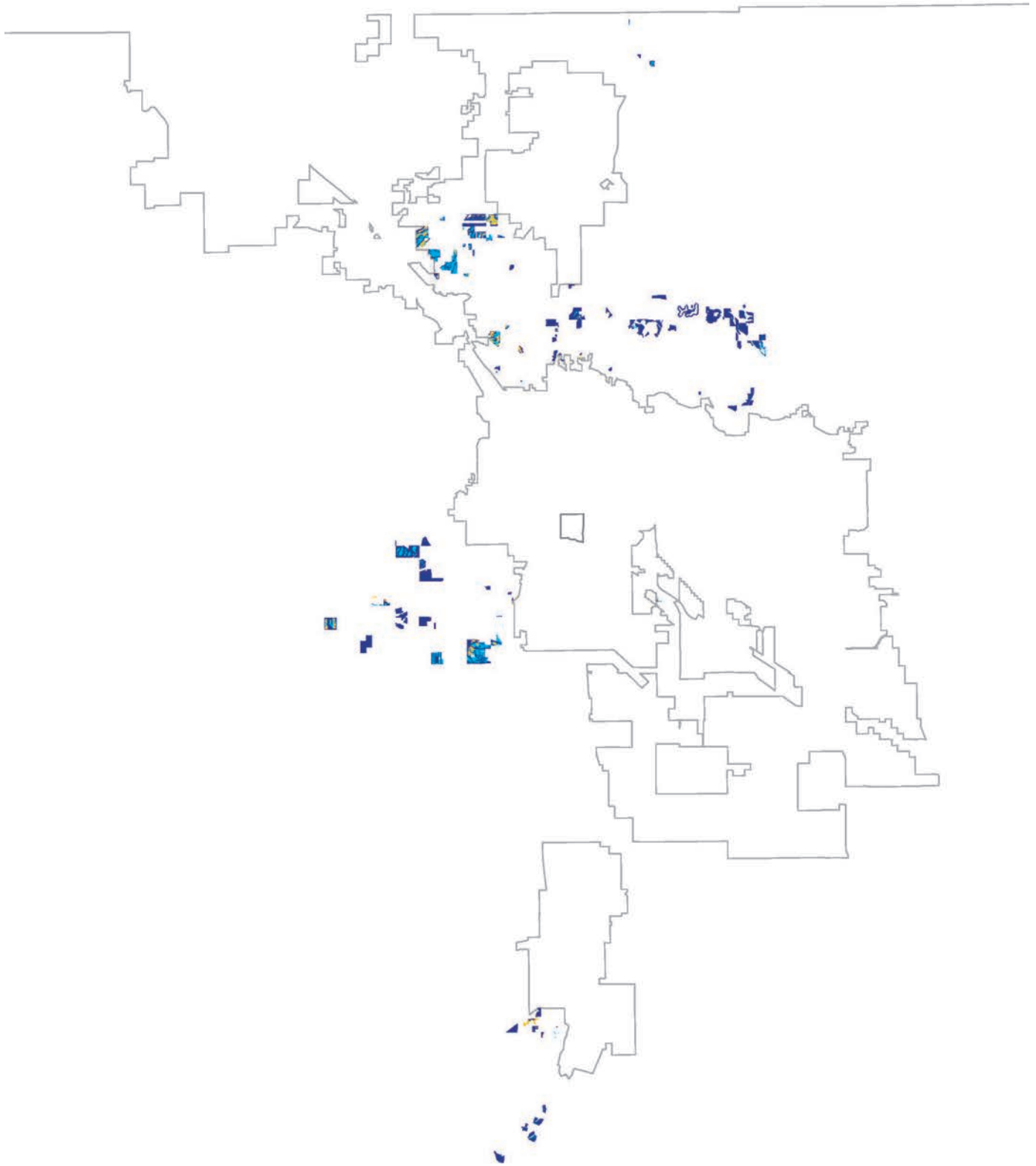
PIMA COUNTY - ZONE CR3 SINGLE RESIDENCE SINGLE FAMILY DWELLINGS

- ZONE CR3, 0.17% OF ZONES IN PIMA COUNTY
- OVER 8,000 SF, 2 UNITS FACTORY OR SITE BUILT, 31% OF CR3
- OVER 16,000 SF, 3 UNITS FACTORY OR SITE BUILT, 2% OF CR3
- OVER 24,000 SF, 4 UNITS FACTORY OR SITE BUILT, 55% OF CR3



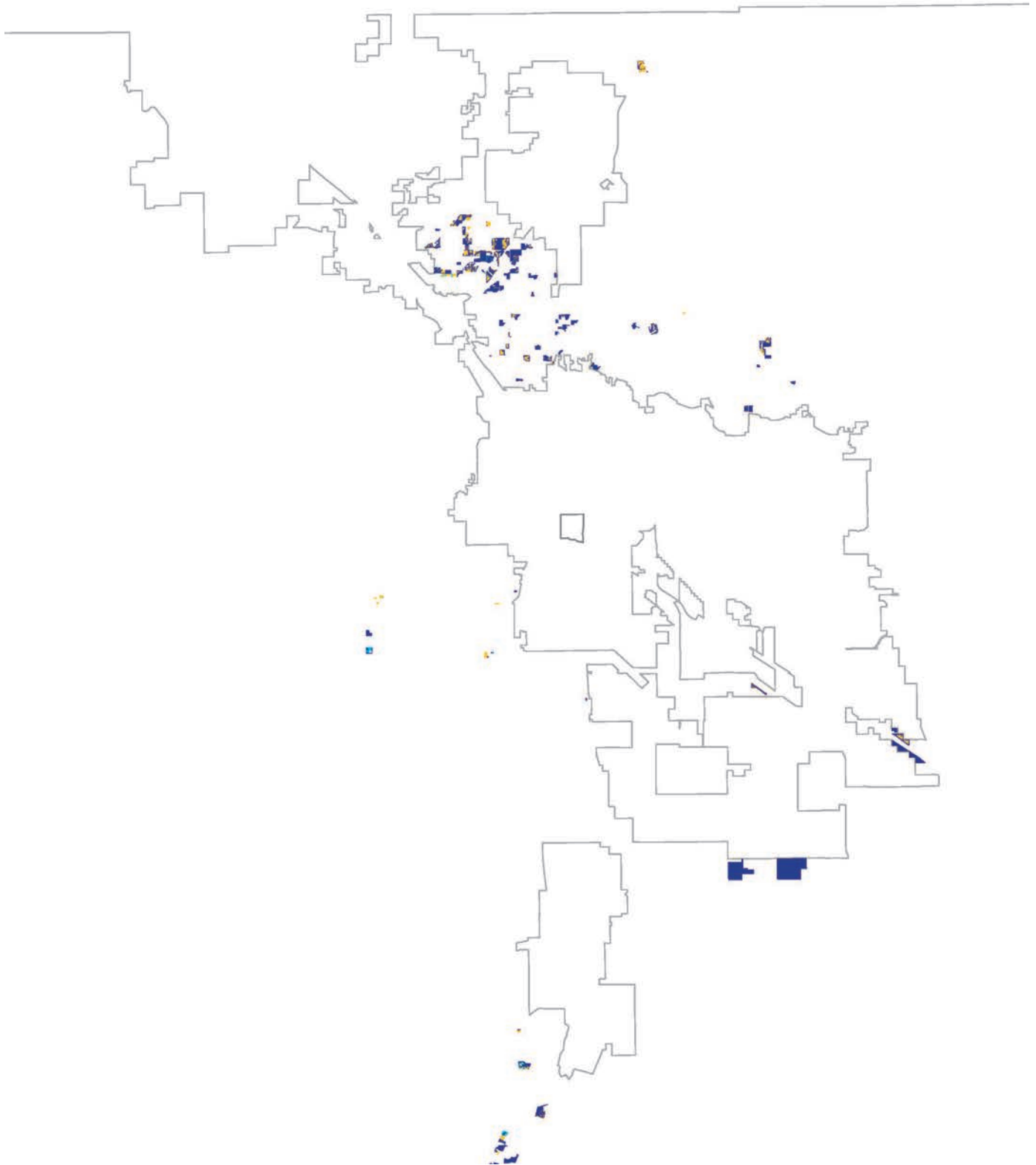
PIMA COUNTY - ZONE CR4 MIXED DWELLING TYPE SINGLE FAMILY DWELLINGS

- ZONE CR4, 0.09% OF ZONES IN PIMA COUNTY
- OVER 14,000 SF, 2 UNITS FACTORY OR SITE BUILT, 3% OF CR4
- OVER 21,000 SF, 3 UNITS FACTORY OR SITE BUILT, 2% OF CR4
- OVER 28,000 SF, 4 UNITS FACTORY OR SITE BUILT, 52% OF CR4



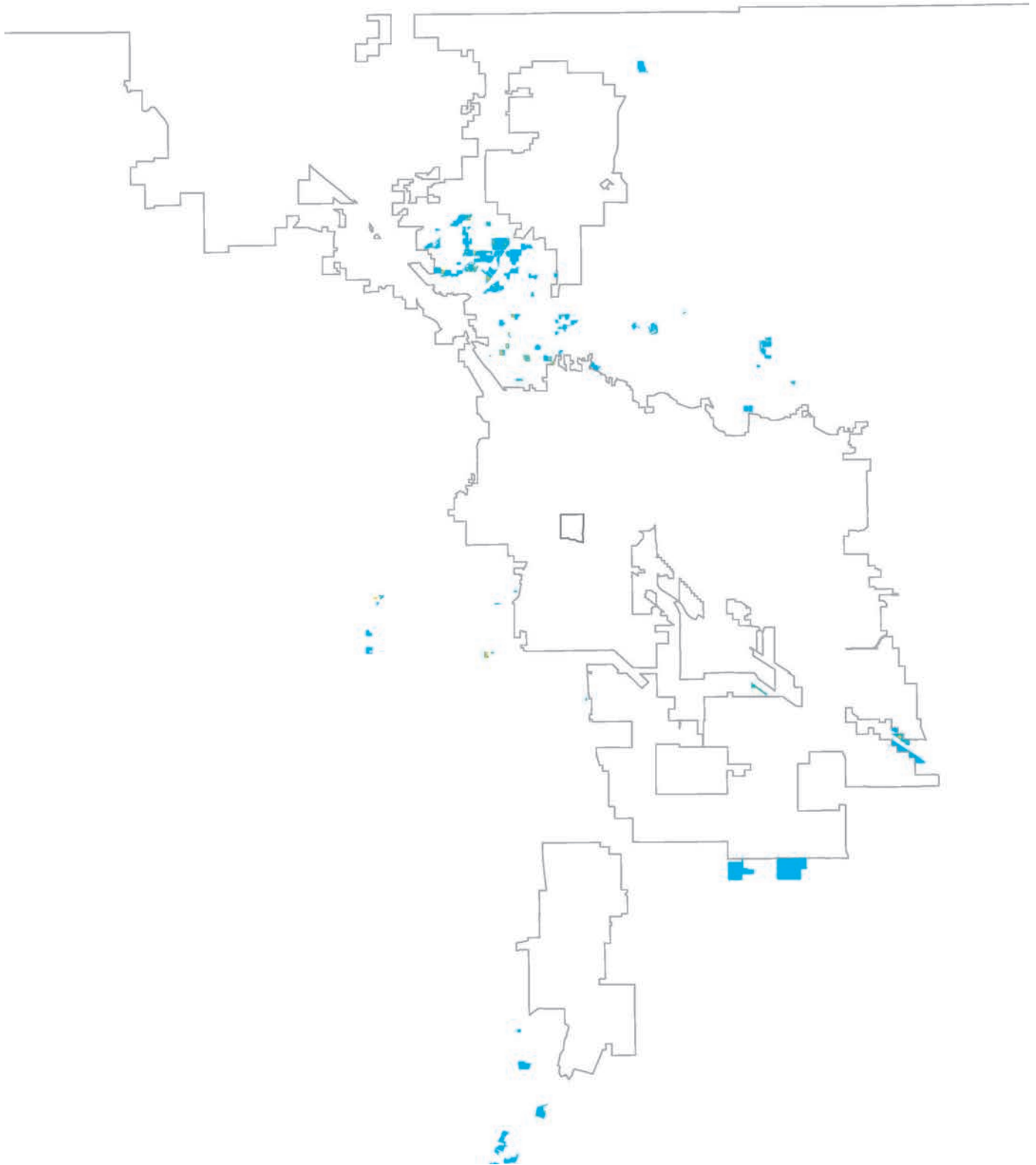
PIMA COUNTY - ZONE CR4 MIXED DWELLING TYPE DUPLEXES, TRIPLEXES, FOURPLEXES

- ZONE CR4, 0.09% OF ZONES IN PIMA COUNTY
- OVER 7,000 SF, DUPLEX FACTORY OR SITE BUILT, 19% OF CR4
- OVER 10,500 SF, TRIPLEX FACTORY OR SITE BUILT, 5% OF CR4
- OVER 14,000 SF, FOURPLEX FACTORY OR SITE BUILT, 57% OF CR4



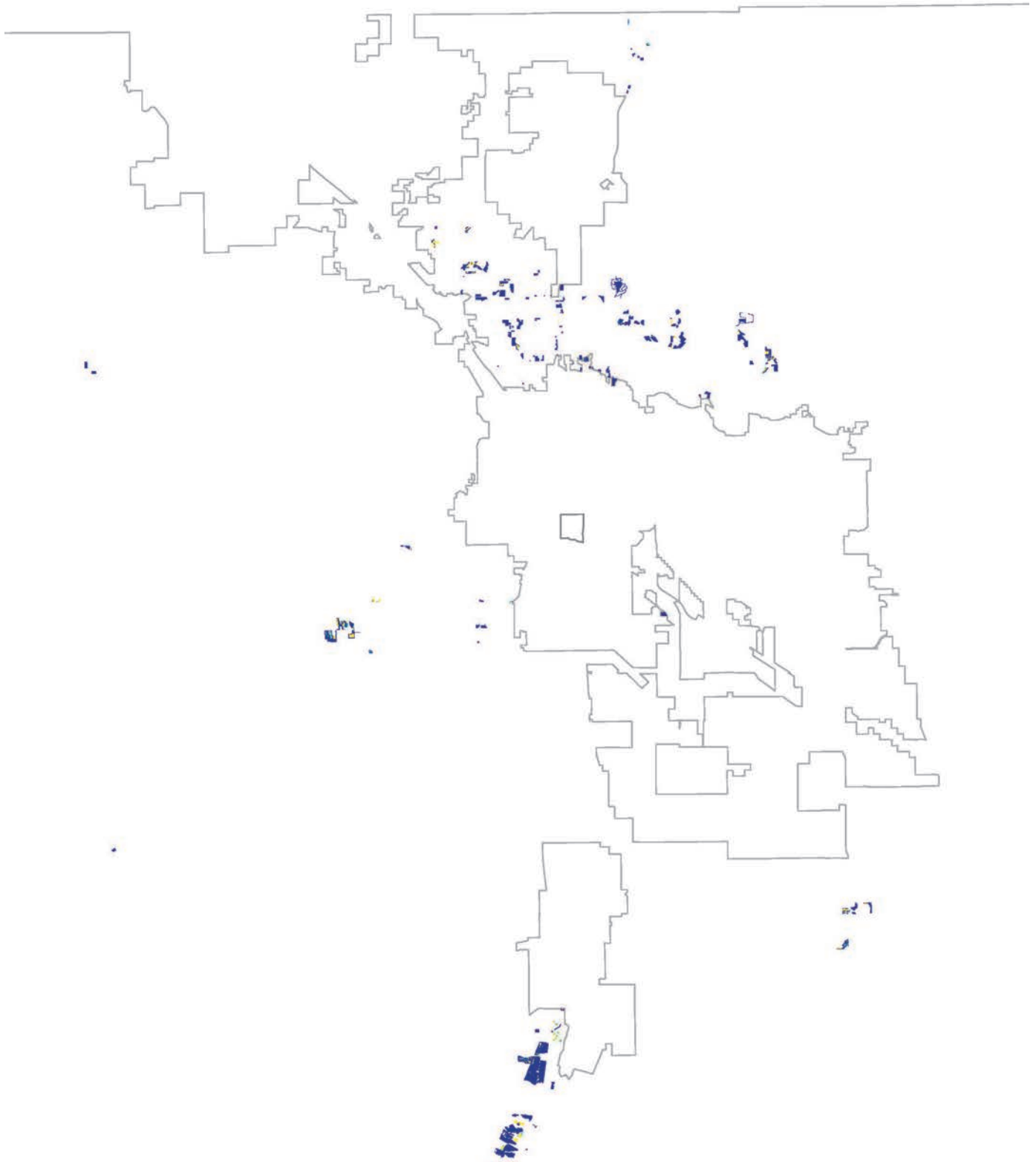
PIMA COUNTY - ZONE CR5 MIXED DWELLING TYPE SINGLE FAMILY DWELLINGS

- ZONE CR5, 0.09% OF ZONES IN PIMA COUNTY
- OVER 14,000 SF, 2 UNITS FACTORY OR SITE BUILT, 2% OF CR5
- OVER 21,000 SF, 3 UNITS FACTORY OR SITE BUILT, 1% OF CR5
- OVER 28,000 SF, 4 UNITS FACTORY OR SITE BUILT, 56% OF CR5



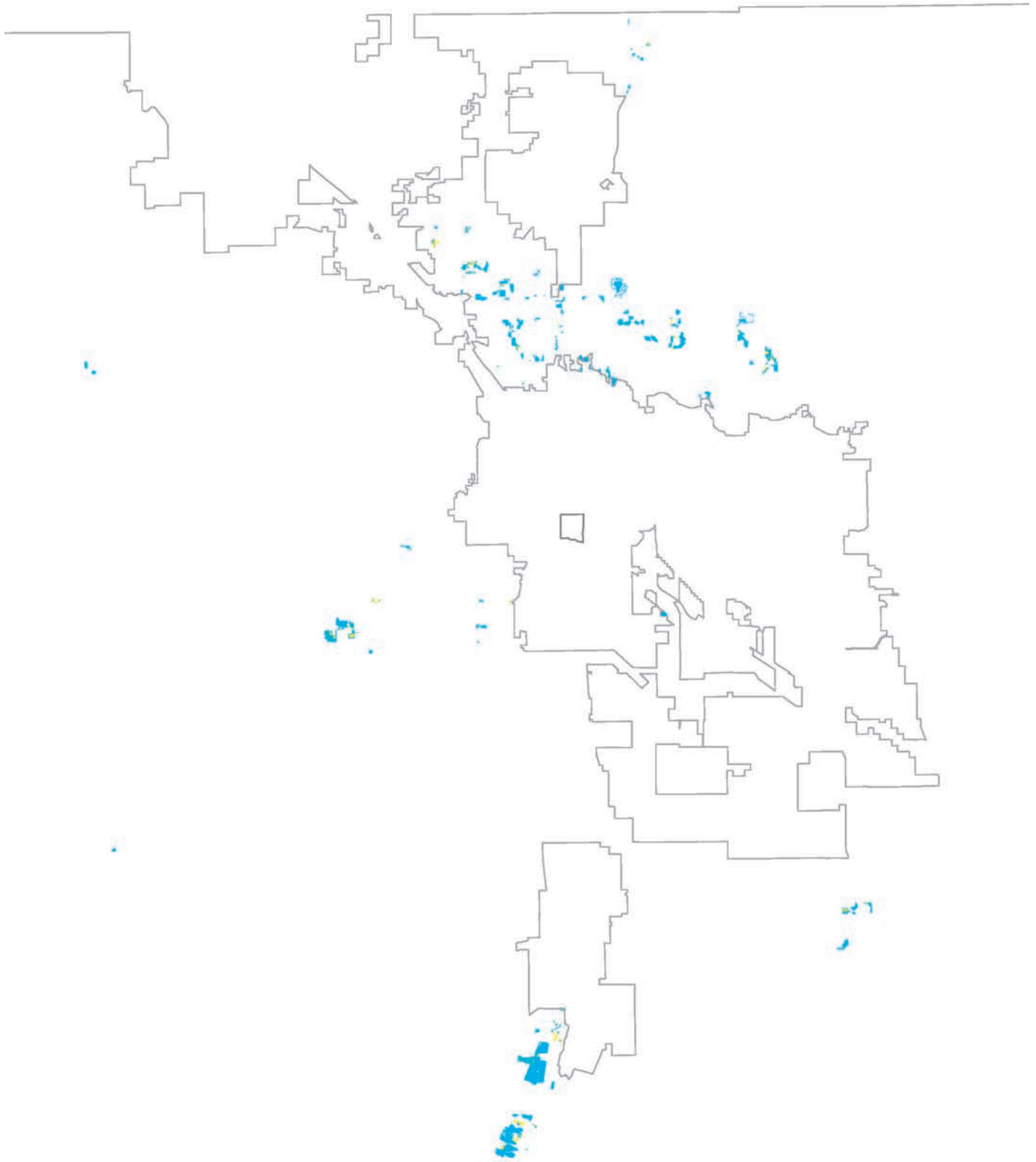
PIMA COUNTY - ZONE CR5 MIXED DWELLING TYPE DUPLEXES, TRIPLEXES, FOURPLEXES

- ZONE CR5, 0.09% OF ZONES IN PIMA COUNTY
- OVER 6,000 SF, DUPLEX FACTORY OR SITE BUILT, 86% OF CR5



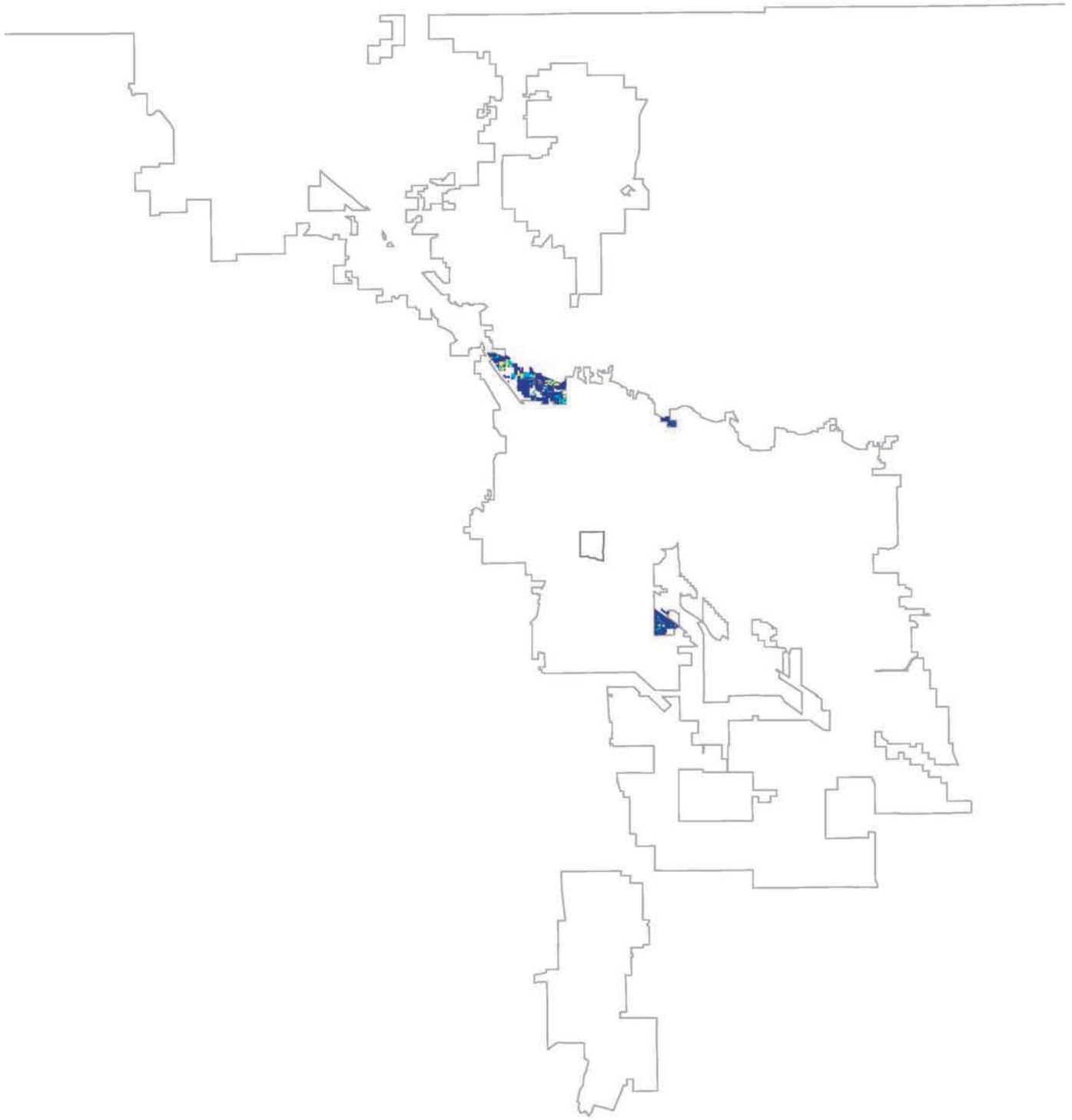
PIMA COUNTY - ZONE TR TRANSITIONAL SINGLE FAMILY DWELLINGS

	ZONE TR, 0.06% OF ZONES IN PIMA COUNTY
	OVER 9,000 SF, 2 UNITS FACTORY OR SITE BUILT, 6% OF TR
	OVER 13,500 SF, 3 UNITS FACTORY OR SITE BUILT, 2% OF TR
	OVER 18,000 SF, 4 UNITS FACTORY OR SITE BUILT, 66% OF TR

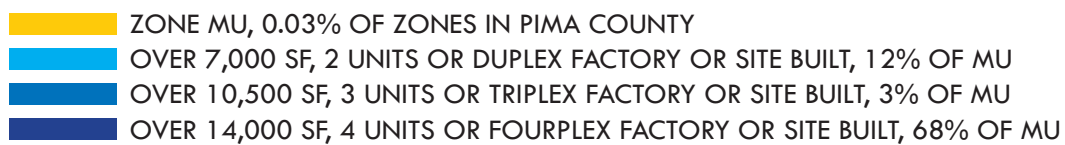


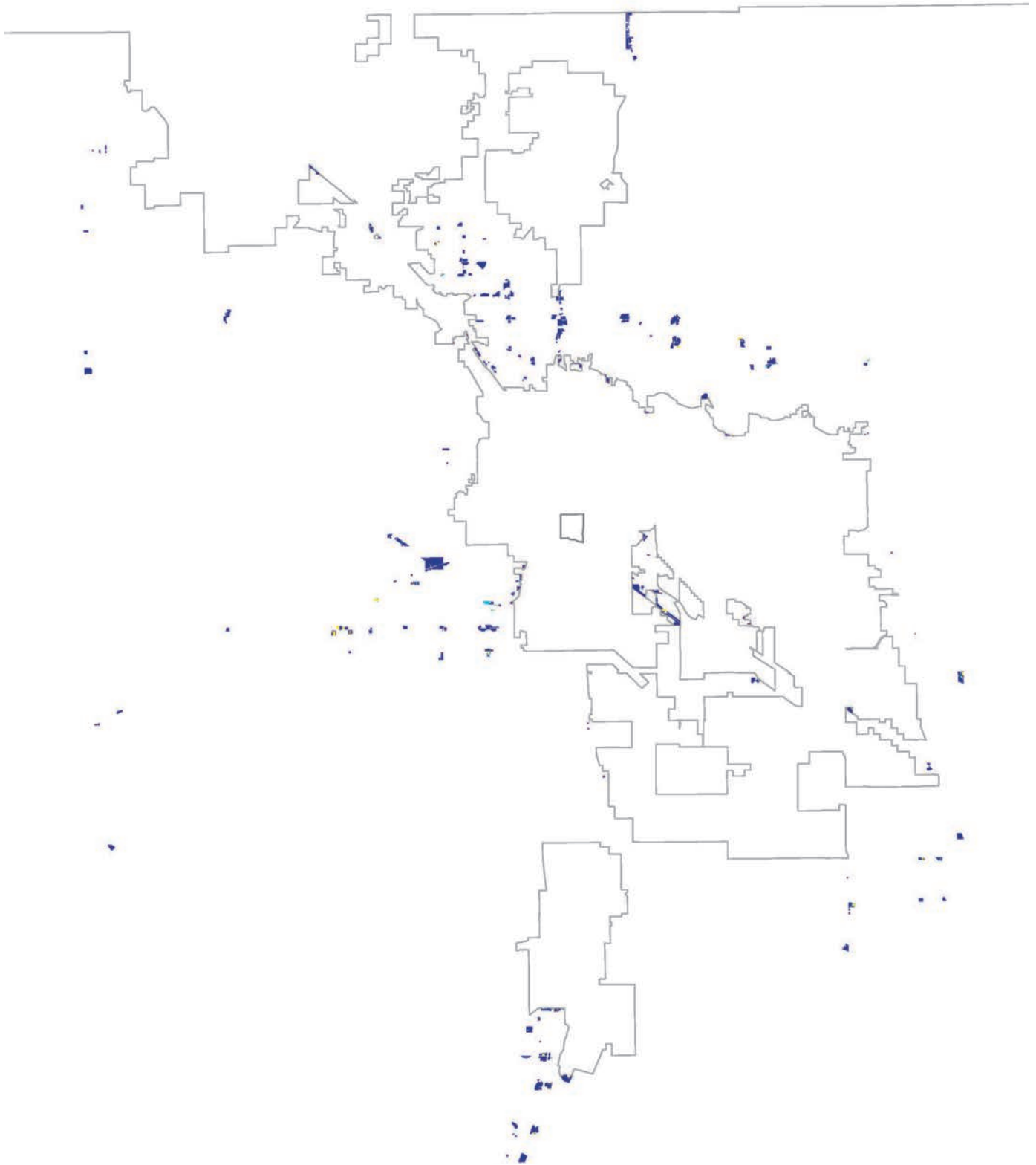
PIMA COUNTY - ZONE TR TRANSITIONAL DUPLEXES, TRIPLEXES, FOURPLEXES

- ZONE TR, 0.06% OF ZONES IN PIMA COUNTY
- OVER 10,000 SF, DUPLEXES, TRIPLEXES, FOURPLEXES FACTORY OR SITE BUILT, 72% OF TR



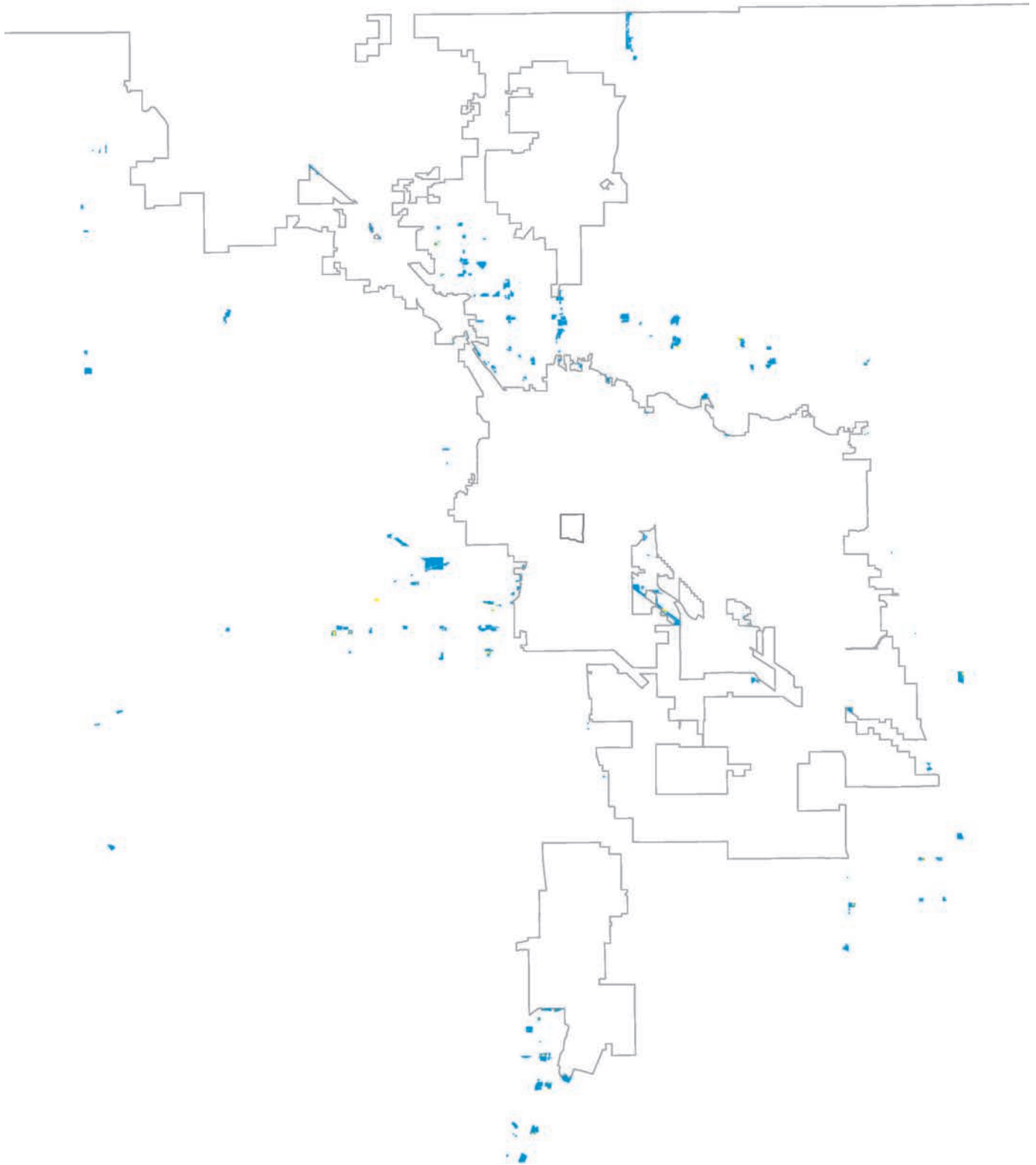
PIMA COUNTY - ZONE MU MULTIPLE USE





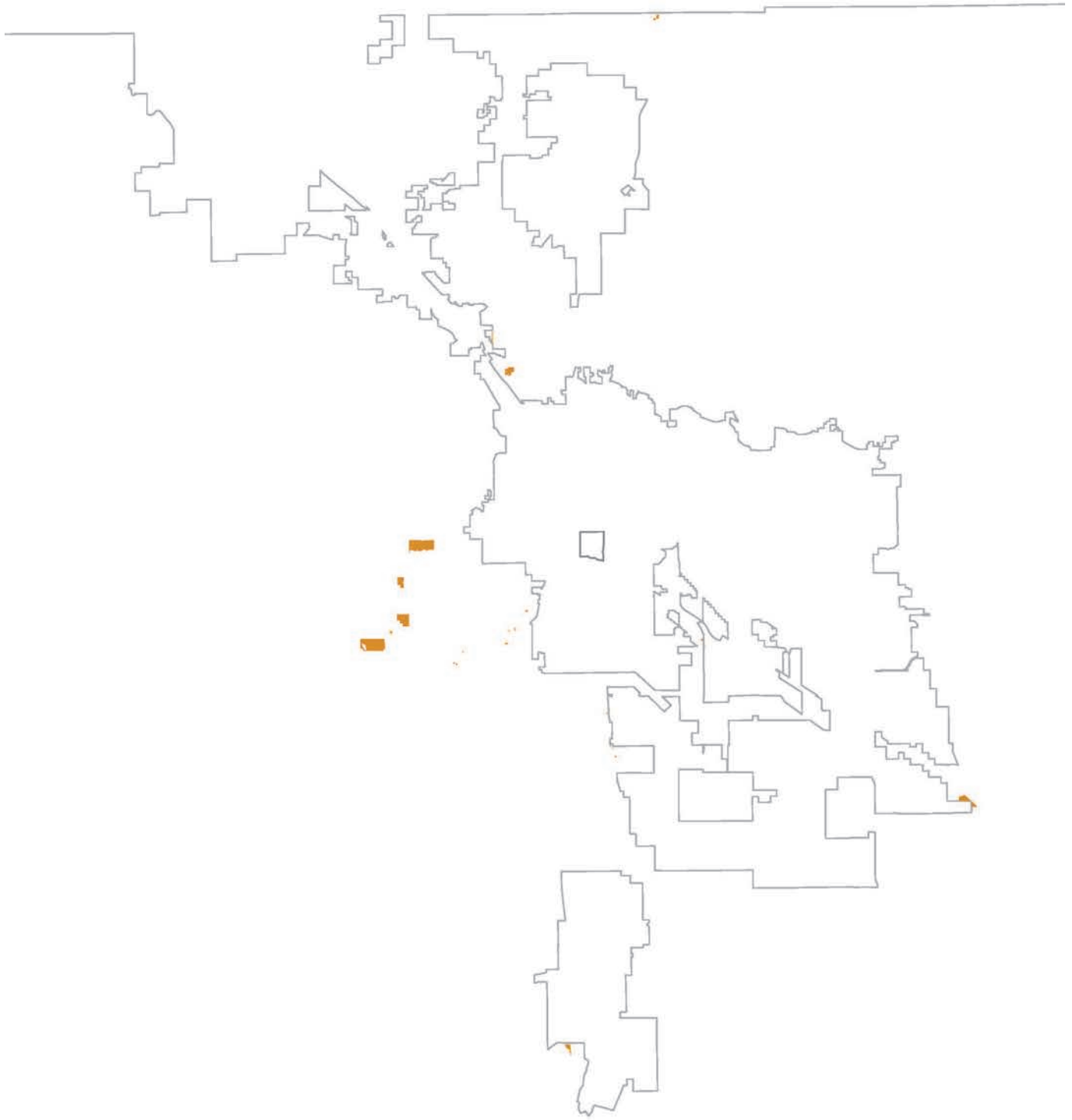
PIMA COUNTY - ZONE CB1 & 2, LOCAL AND GENERAL BUSINESS SINGLE FAMILY DWELLINGS

- ZONE CB1 & 2, 0.05% OF ZONES IN PIMA COUNTY
- OVER 9,000 SF, 2 UNITS FACTORY OR SITE BUILT, 3% OF ZONE
- OVER 13,500 SF, 3 UNITS FACTORY OR SITE BUILT, 2% OF ZONE
- OVER 18,000 SF, 4 UNITS FACTORY OR SITE BUILT, 88% OF ZONE




PIMA COUNTY - ZONE CB1 & 2 LOCAL AND GENERAL BUSINESS DUPLEXES, TRIPLEXES, FOURPLEXES

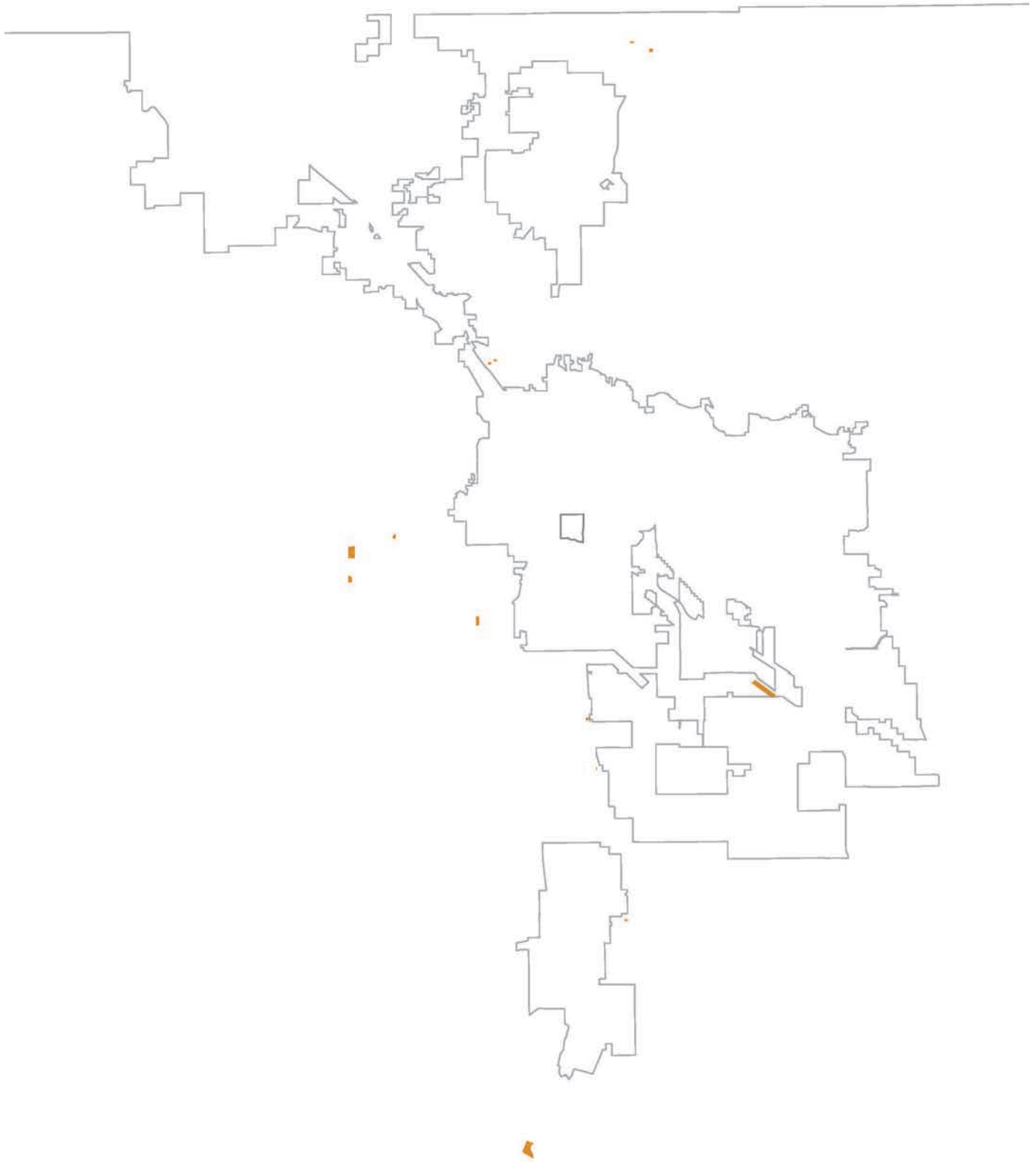
- ZONE CB1 & 2, 0.05% OF ZONES IN PIMA COUNTY
- OVER 10,000 SF, DUPLEX, TRIPLEX, FOURPLEX FACTORY OR SITE BUILT, 92% OF CB1 & 2




PIMA COUNTY - ZONE CMH1 MOBILE HOME

 ZONE CMH1, 0.01% OF ZONES IN PIMA COUNTY

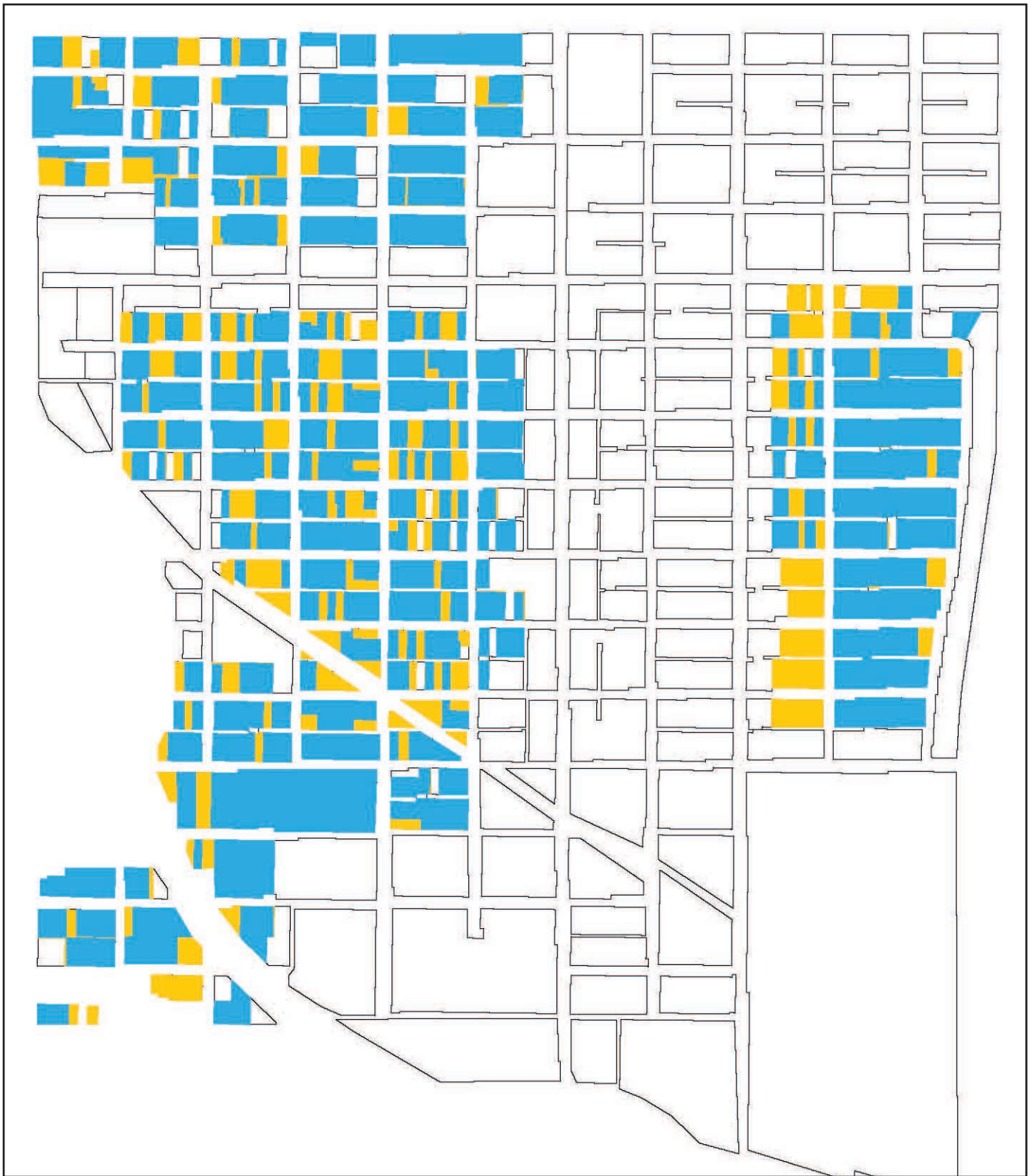
 OVER 8,000 SF, 8 MOBILE HOME UNITS PER ACRE, 100% OF CMH1



PIMA COUNTY - ZONE CMH2 MOBILE HOME

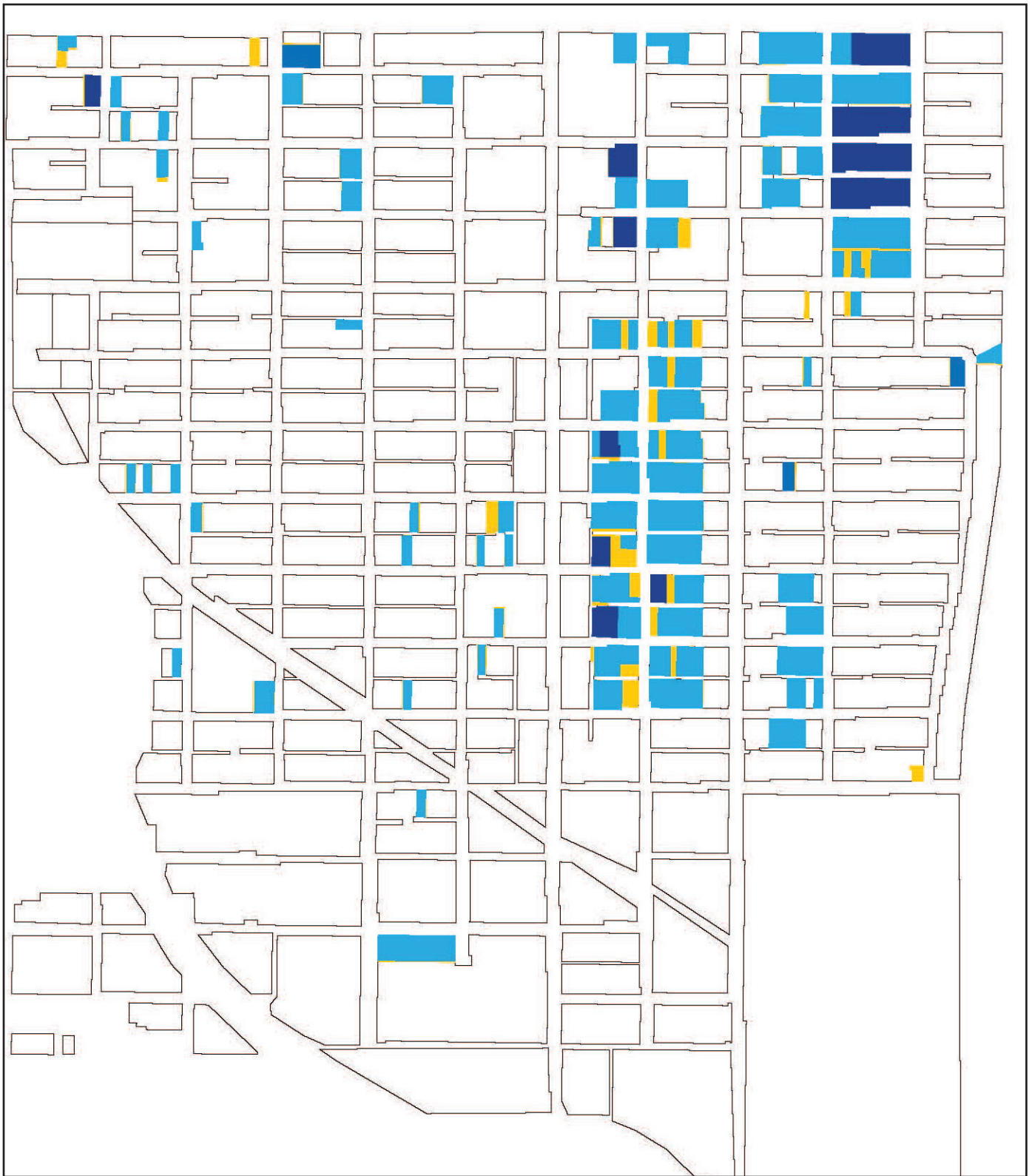
 ZONE CMH2, 0.01% OF ZONES IN PIMA COUNTY

 OVER 5,000 SF, 15 MOBILE HOME UNITS PER ACRE, 100% OF CMH1



SOUTH TUCSON - ZONE SR1 SINGLE FAMILY

- ZONE SR1, 39% OF ZONES IN SOUTH TUCSON
- OVER 6,500 SF, 2 UNITS, 78% OF SR1



SOUTH TUCSON - ZONE SR2 SINGLE FAMILY

- ZONE SR2, 11% OF ZONES IN SOUTH TUCSON
- OVER 6,000 SF, 2 UNITS OR DUPLEX, 70% OF SR2
- OVER 9,000 SF, 3 UNITS OR TRIPLEX, 41% OF SR2
- OVER 12,000 SF, 4 UNITS OR FOURPLEX, 21% OF SR2



SOUTH TUCSON - ZONE SR3 SINGLE FAMILY

- ZONE SR3, 0.01% OF ZONES IN SOUTH TUCSON
- OVER 6,000 SF, 2 UNITS OR DUPLEX, 90% OF SR3
- OVER 9,000 SF, 3 UNITS OR TRIPLEX, 0% OF SR3
- OVER 12,000 SF, 4 UNITS OR FOURPLEX, 0% OF SR3



SOUTH TUCSON - ZONE SB1/SB2 RETAIL LOCAL/BUSINESS

- ZONE SB1 & SB2, 11% OF ZONES IN SOUTH TUCSON
- ALL LAND, 2, 3, 4 UNITS OR DUPLEX, TRIPLEX, FOURPLEX, 100% OF SB1 & SB2



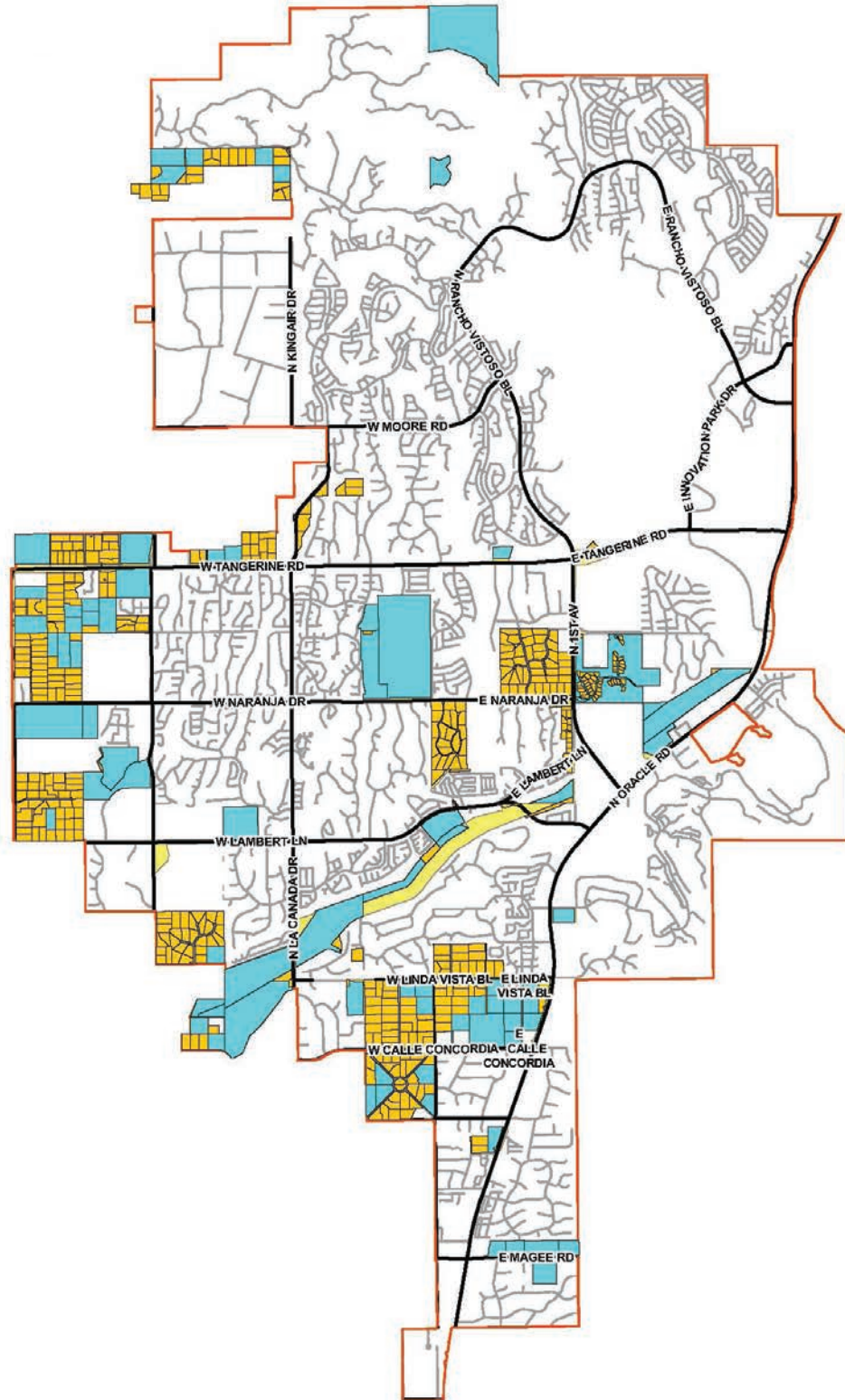
SOUTH TUCSON - ZONE SB2A LOCAL RETAIL CENTER

- ZONE SB2A, 12% OF ZONES IN SOUTH TUCSON
- OVER 6,500 SF, 2, 3, 4 UNITS OR DUPLEX, TRIPLEX, FOURPLEX, 94% OF SB2A



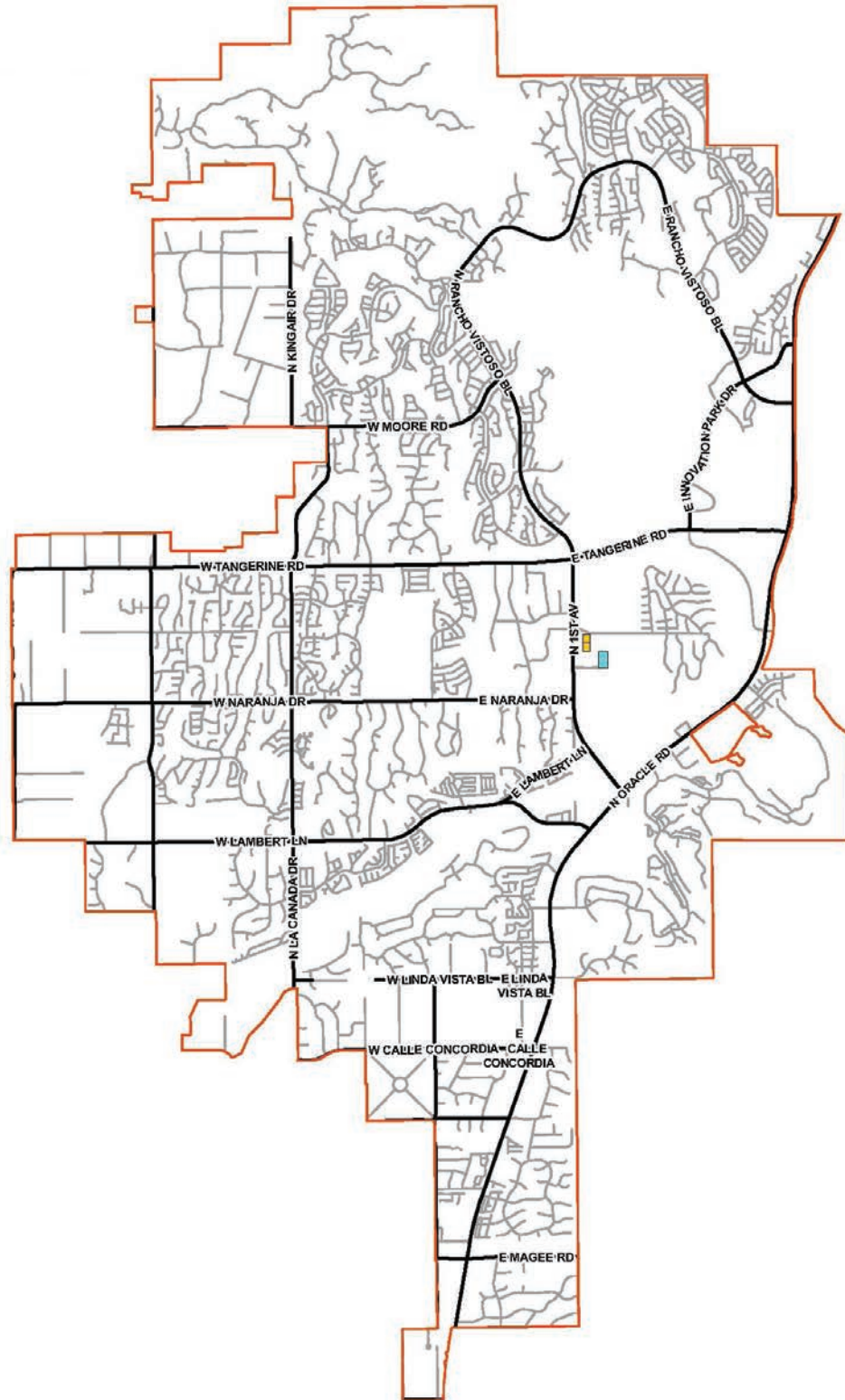
SOUTH TUCSON - ZONE SMH MOBILE HOMESITE

	ZONE SMH, 0.002% OF ZONES IN SOUTH TUCSON
	OVER 13,000 SF, 2 MOBILE HOMES, 0% OF ZONE
	OVER 19,500 SF, 3 MOBILE HOMES, 0% OF ZONE
	OVER 26,000 SF, 4 MOBILE HOMES, 0% OF ZONE



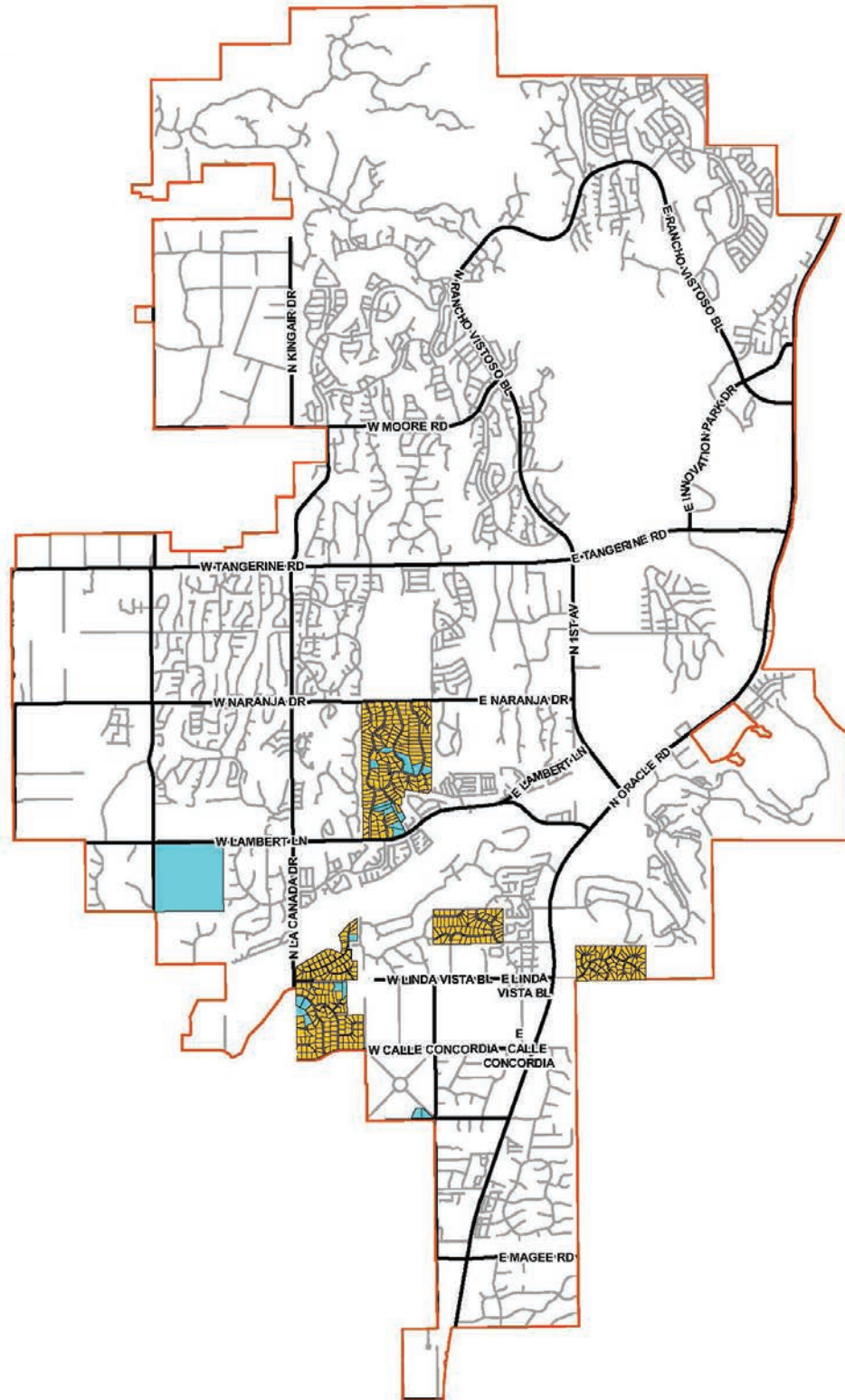
ORO VALLEY - ZONE R1-144 SINGLE FAMILY

- ZONE R1-144, 15% OF ZONES IN ORO VALLEY
- OVER 288,000 SF, 2 UNITS, 49.6% OF R1-144



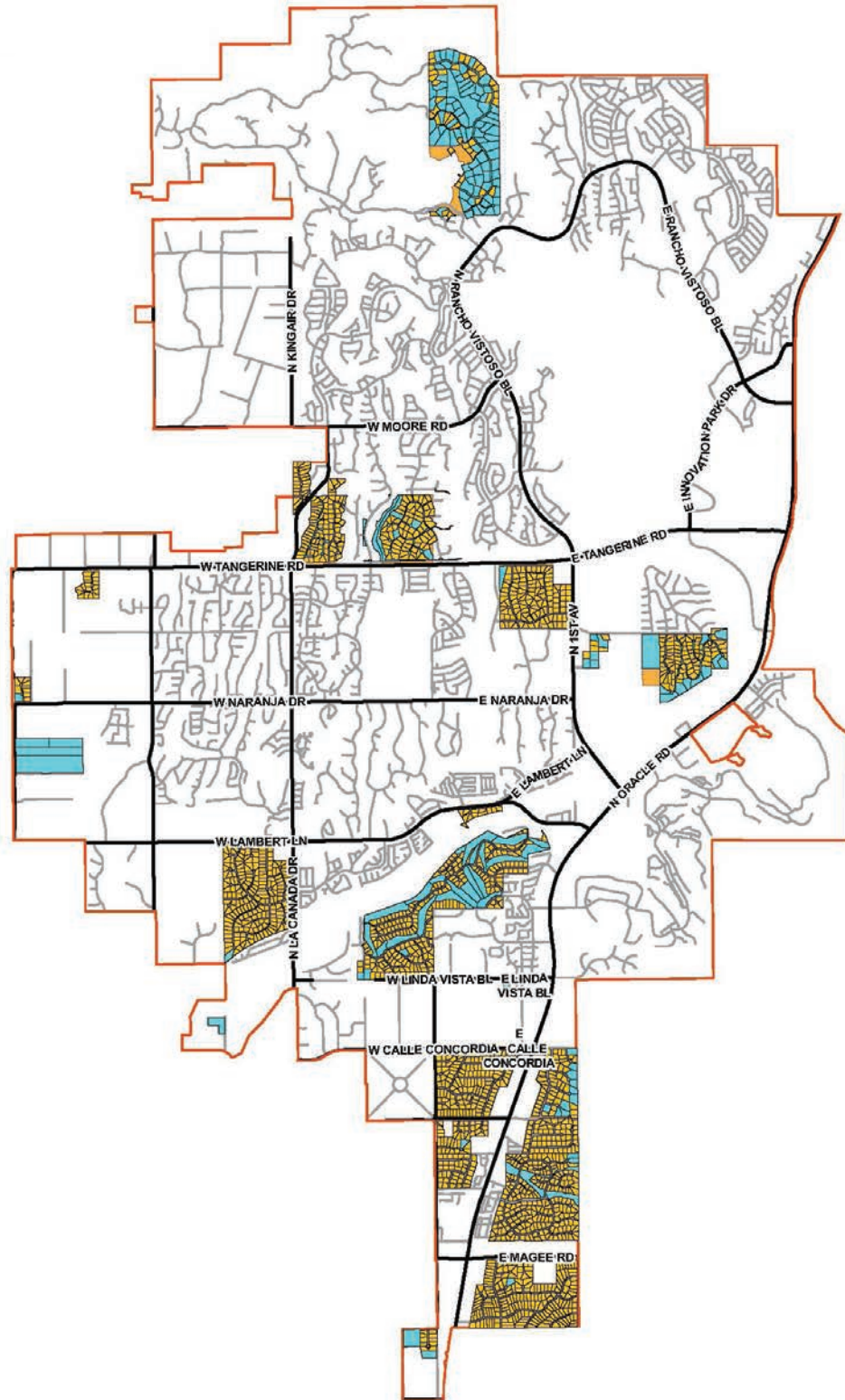
ORO VALLEY - ZONE R1-72 SINGLE FAMILY SINGLE FAMILY DWELLINGS

- ZONE R1-72, 4% OF ZONES IN ORO VALLEY
- OVER 144,000 SF, 2 UNITS, 53.8% OF R1-72

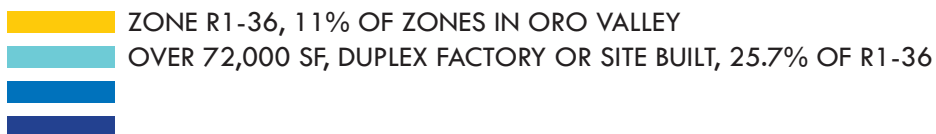


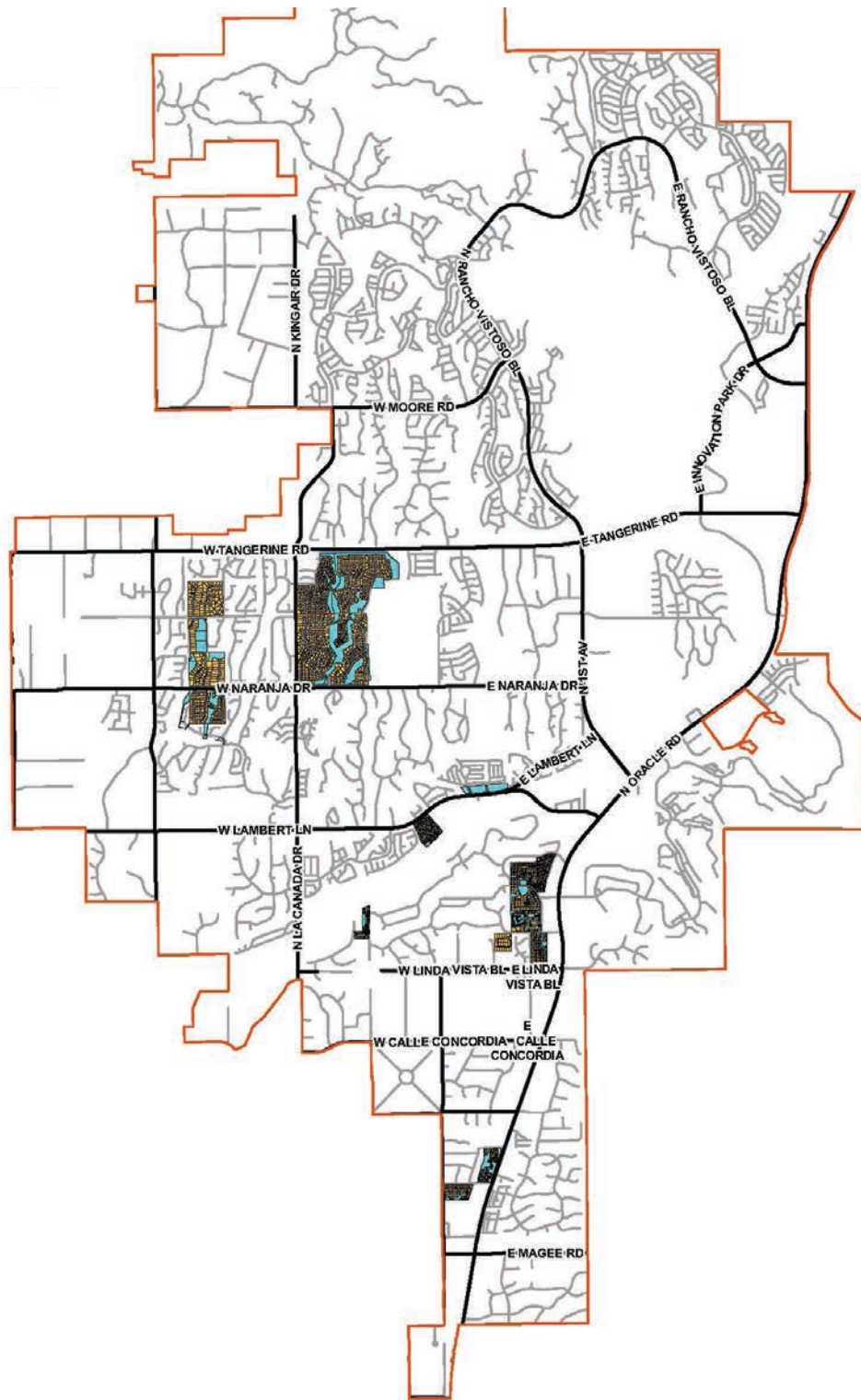
ORO VALLEY - ZONE R1-43 SINGLE FAMILY SINGLE FAMILY DWELLINGS

- ZONE R1-43, 3% OF ZONES IN ORO VALLEY
- OVER 87,210 SF, 2 UNITS, 26.3% OF R1-43



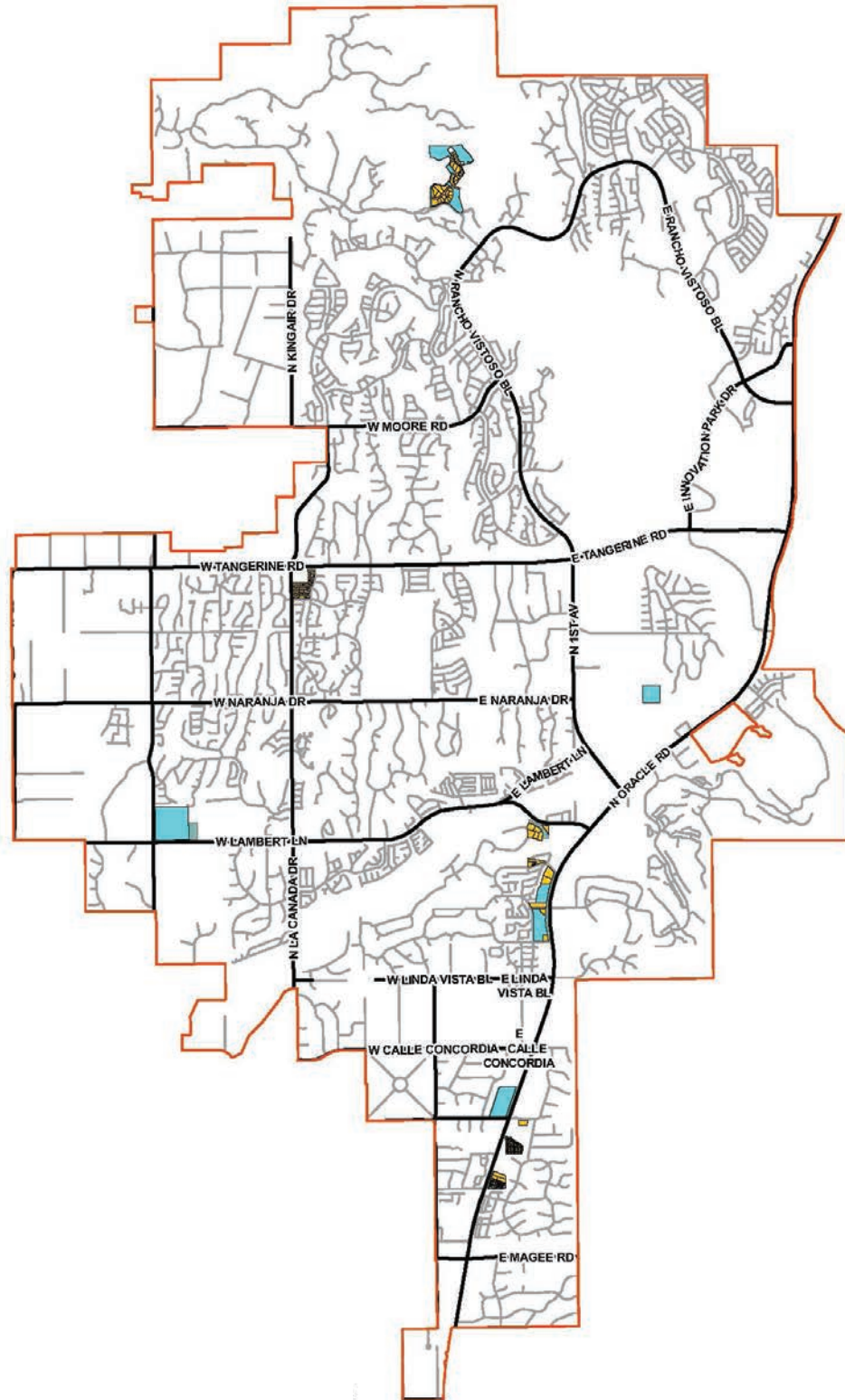
ORO VALLEY - ZONE R1-36 SINGLE FAMILY





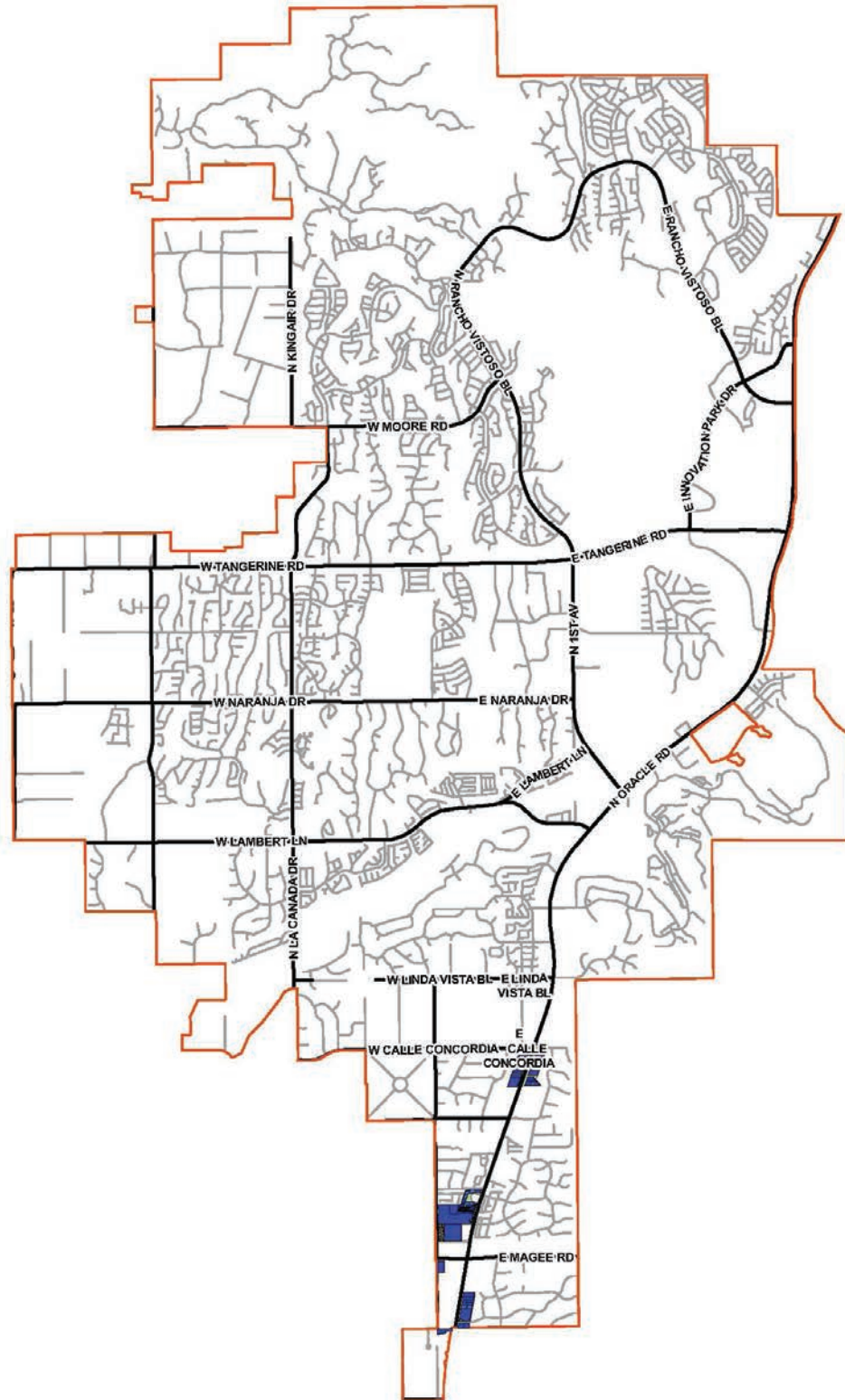
PIMA COUNTY - ZONE R4 MULTIFAMILY

- ZONE R4, 3% OF ZONES IN ORO VALLEY
- OVER 43,560 SF, 2+ UNITS (1 PER 5,450 SF OF LAND), 24.9% OF R4



ORO VALLEY - ZONE R6 MULTIFAMILY

- ZONE R6, 0.7% OF ZONES IN ORO VALLEY
- OVER 5 ACRES, 2+ UNITS (1 UNIT PER 3,500 SF OF LAND), 64% OF R6



ORO VALLEY - ZONE RS MULTIFAMILY

- ZONE RS, 0.4% OF ZONES IN ORO VALLEY
- OVER 10,900 SF, 2 UNITS OR DUPLEX, 0.4% OF RS
- OVER 16,350 SF, 3 UNITS OR TRIPLEX, 4.9% OF RS
- OVER 21,800 SF, 4 UNITS OR FOURPLEX, 65.1% OF RS